

EXHIBIT 2

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

JAMES D. SULLIVAN, et)
al., individually, and)
on behalf of a Class of)
persons similarly)
situated,) Civil Action No.
5:16-cv-00125
Plaintiffs,)
vs.)
SAINT-GOBAIN)
PERFORMANCE PLASTICS)
CORPORATION,)
Defendant.)

VIDEOTAPED DEPOSITION OF LESLIE ADDISON,
taken pursuant to notice before Beth Gaige,
Registered Professional Reporter, at the
offices of BarrSternberg Moss Silver & Munson,
P.C. 507 Main Street, Bennington, VT, on
April 13, 2018, commencing at 9:33 a.m.

A P P E A R A N C E S

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STIPULATION

(It is hereby agreed by and between the parties that signature is not waived.)

— — — — —

THE VIDEOGRAPHER: We are now on the record. Please note that the microphones are sensitive and may pick up whispering and private conversations. Please turn off all cell phones or place them away from the microphones as they can interfere with the deposition audio. Recording will continue until all parties agree to go off the record.

My name is Edward Roy, representing Veritext. The date today is April 13th, 2018. The time is now approximately 9:33 a.m.

This deposition is being held at
BarrSternberg Moss Silver & Munson, P.C.,
located at 507 Main Street, Bennington,
Vermont, and is being taken by counsel for the
defendant.

The caption of the case is James D. Sullivan, et al, individually and on behalf of a class of persons similarly situated, Plaintiffs, versus Saint-Gobain Performance Plastics Corporation, Defendant.

This case is filed in the United States District Court, District of Vermont, Civil Action No. 5:16-CV-00125. The name of the witness is Leslie Addison.

At this time the attorneys present in the room and attending remotely will identify themselves and the parties they represent.

MS. SCHWARZ: Marina Schwarz for Saint-Gobain Performance Plastics.

MR. WILLIAMS: Nathan Williams for Saint-Gobain Performance Plastics.

MR. SILVER: David F. Silver for the plaintiff.

MS. JOSELSON: Emily Joselson for the plaintiff.

THE VIDEOGRAPHER: Will Attorney David Silver, representing BarrSternberg Law, please swear in the witness and we can proceed.

(The Witness was administered the oath.)

LESLIE ADDISON, having been duly sworn by the
Notary Public, was examined and testified as
follows:

DIRECT EXAMINATION

BY MS. SCHWARZ:

Q. Good morning, Miss Addison.

1 A. Hello.

2 Q. And I know we introduced ourselves off the
3 record briefly, but if you could, could you
4 please state your name for the record?

5 A. Leslie Addison.

6 Q. And have you ever been deposed before?

7 A. I have.

8 Q. When was that?

9 A. About 20 years ago.

10 Q. Miss Addison, my name is Marina Schwarz, and I
11 represent the Defendant Saint-Gobain in this
12 litigation.

13 Do you understand that?

14 A. (Nod)

15 Q. And I'm sure your attorneys went over some of
16 the basic ground rules, but if -- if you could
17 bear with me I'd like to go through a few of
18 them with you.

19 A. Okay.

20 Q. Okay. So there's going to be times where
21 you're going to know exactly where I'm headed
22 with my questions, and it's just natural to
23 want to kind of provide the answer before I'm
24 done; but if you could wait until I finish my
25 question before answering, I think that would

1 be helpful for the court reporter here.

2 Does that make sense to you?

3 A. Yes.

4 Q. Great. And if you don't understand a question
5 I've asked, please just let me know, and I can
6 clarify it.

7 A. Okay.

8 Q. If you don't let me know, I'm going to go
9 ahead and assume that you did understand it.

10 Is that fair?

11 A. Yes.

12 Q. Okay. And, like I said, we have a court
13 reporter here taking down everything that
14 we're saying, so it's very important to give
15 verbal responses. So try not to shake your
16 head, say mm-hmm or uh-uh and that would -- I
17 will try to do the same. Okay?

18 A. Okay.

19 Q. And then finally, we might get into some
20 personal or sensitive sort of areas due to the
21 nature of the litigation. It's not my
22 intention at all to make you feel
23 uncomfortable or embarrassed in any way. If
24 you do, just let me know, and I'll see if we
25 can't work through it. Okay?

1 A. Okay.

2 Q. You mentioned you were deposed 20 years ago;
3 is that right?

4 A. Yes.

5 Q. And what was the nature of the -- was it --
6 was it in a litigation?

7 A. I don't know -- I don't know, but it was a
8 lawsuit involving a boss that I had at the
9 time who was engaging in a lawsuit against the
10 company I worked for.

11 Q. What company was that?

12 A. Northeast Career Planning.

13 Q. And did you testify at a -- at trial?

14 A. I was deposed.

15 Q. And were you there on behalf of the company
16 that you were working for?

17 A. I was asked to be there because I worked for
18 the company.

19 Q. Okay.

20 A. If that's what you mean.

21 Q. Yes. And was it an employment action?

22 A. Yes.

23 Q. Okay. Miss Addison, did you do anything to
24 prepare for today's deposition?

25 A. I've had conversations with my attorneys to

1 become familiar with the process.

2 Q. And I absolutely do not want to know anything
3 that you discussed with your attorneys.
4 That's privileged information.

5 But can you tell me, did you review any
6 documents to prepare for today?

7 A. I had meetings with my attorneys, and that's
8 where I prepared for the deposition.

9 Q. Do you recall reviewing any -- any documents?

10 A. Yes.

11 Q. And in general what categories of documents
12 did you review?

13 A. They were documents that were supplied to you
14 on our behalf. They were documents that we
15 provided in response to questions that you had
16 asked from us. That sort of thing.

17 Q. And did they include medical records?

18 A. I did not get copies of my medical records. I
19 did receive some. I take that back. I recall
20 that I did get a couple, but I didn't get the
21 complete set.

22 Q. And property records?

23 A. Yes. Yeah.

24 Q. And I'm sorry to ask this, but how old are
25 you, Miss Addison?

1 A. I'm 56.

2 Q. Okay. And what's your date of birth?

3 A. 11/30/61.

4 Q. And have you ever gone by any other name?

5 A. Johnas.

6 Q. Could you please state your current address?

7 A. 35 Asa's Way, North Bennington.

8 Q. And I'm sorry. You said North Bennington,
9 Vermont?

10 A. North Bennington, yes.

11 Q. How long have you lived at 35 Asa's Way?

12 A. Since 2008.

13 Q. Prior to moving to 35 Asa's Way, did you live
14 anywhere else in Bennington?

15 A. Yes.

16 Q. And where was that?

17 A. That was on South Street from August until we
18 moved into the house of that same year.

19 Q. So from August of 2008 --

20 A. 2008.

21 Q. -- and until?

22 A. December 2008.

23 Q. And the home on South Street, was that an
24 apartment or a house?

25 A. It was a house, and we rented part of it.

1 Q. When you say part of it, was it a duplex?

2 A. It was a downstairs/upstairs, and we had the
3 downstairs.

4 Q. Were there tenants upstairs?

5 A. Yes.

6 Q. Yes? And who lived with you at South Street?

7 A. My husband Jim, my sons Nick and Luke and my
8 stepdaughter Kerry.

9 Q. Prior to 2008, had you been to North
10 Bennington -- I'm sorry. Withdrawn.

11 Prior to 2008 had you visited Bennington?

12 A. Yes.

13 Q. When was the first time that you visited
14 Bennington, Vermont?

15 A. Visited?

16 Q. Yeah. When was the first time you -- you went
17 to Bennington, Vermont?

18 A. The first time I've been to Bennington?

19 Q. Yeah.

20 A. I don't remember -- I can't say that I
21 remember exactly, because I grew up in
22 Pittsfield, Mass, so I probably travelled
23 through town.

24 Q. Okay.

25 A. But when I was raising my children, when I

[illegible]

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[REDACTED] [REDACTED]

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[REDACTED]

11 Q. Where did you live prior to South Street?

12 A. In Niskayuna, New York.

13 THE REPORTER: I'm sorry. Say that name.

14 THE WITNESS: Niskayuna,

15 N-i-s-k-a-y-u-n-a. Niskayuna, New York.

16 BY MS. SCHWARZ:

17 Q. And can you give us the address, please?

18 A. 2336 Almeria, A-l-m-e-r-i-a, Road.

19 Q. And who lived with you at the Almeria Road
20 home?

21 A. Well, when I left there, I -- my -- my -- I
22 was divorced, but for my duration there, it
23 was all of children and my then husband.

24 Q. When did you move into Almeria Road?

25 A. 1986.

1 Q. And when did you move out?

2 A. In 2008.

3 Q. And was it a house or an apartment?

4 A. Mm-hmm. It was a house.

5 Q. Was it preowned or did you build it?

6 A. It was preowned.

7 Q. Okay. Do you know approximately how old
8 the -- the home was?

9 A. I don't recall exactly. I think it was maybe
10 built in the '20s. I'm kind of guessing a
11 little bit.

12 Q. Did you do any renovations to the home?

13 A. Yes.

14 MS. JOELSON: I'm going to have to just
15 object that the questions seem to be quite far
16 afield of PFOA in Bennington, asking about
17 renovations in a home that she owned in the
18 '80s.

19 MS. SCHWARZ: The speaking objection is
20 noted. Objection is just fine.

21 BY MS. SCHWARZ:

22 Q. You may answer.

23 A. Yes.

24 MS. JOELSON: She did answer.

25 MS. SCHWARZ: You interrupted her. I

1 didn't hear the answer, counsel.

2 BY MS. SCHWARZ:

3 Q. I'm sorry. Yes?

4 A. Can you repeat the question?

5 Q. Sure.

6 Did you do any renovations to the home
7 after moving in?

8 A. Yes.

9 Q. Okay. Can you generally describe those
10 renovations?

11 A. New Sheetrock, new windows, general repairs.

12 Q. When you moved in, was there carpeting in the
13 home?

14 A. Yes.

15 MS. JOSELSON: I'm also going to object
16 to the extent any of this goes beyond the
17 general 20-year timeline that the Court has
18 identified as relevant.

19 MS. SCHWARZ: The objection is to form.
20 That's the -- you know that.

21 MS. JOSELSON: We have --

22 MS. SCHWARZ: I'm not sure what the
23 basis --

24 MS. JOSELSON: Counsel, we've done no
25 stipulations in this case. I make my

1 objections for the record.

2 MS. SCHWARZ: Are you suggesting that you
3 can have speaking objections throughout this
4 deposition?

5 MS. JOSELSON: I will make my objections.

6 MS. SCHWARZ: We will be here for quite
7 some time then.

8 BY MS. SCHWARZ:

9 Q. Miss Addison, you can go ahead and answer.

10 A. Can you repeat the question?

11 Q. Sure.

12 Was there carpeting in the home when you
13 moved in?

14 A. I believe there was.

15 Q. And did you leave it or did you take it out,
16 change the flooring?

17 A. We removed it.

18 Q. You moved in in 1986, correct?

19 A. Yes.

20 Q. And do you know approximately how long you
21 lived with the original carpet before you
22 removed it?

23 A. We didn't. We removed it before we moved in.

24 Q. So you had it removed before you moved in, and
25 did you replace it with carpeting?

1 A. No. Hardwood floors. That was already there.

2 We just cleaned the floors up.

3 Q. And there was no other carpeting in that home?

4 A. When we moved in or while --

5 Q. Yes.

6 A. -- I was there?

7 Q. When you -- when you first moved in.

8 A. We removed it all.

9 Q. And was that before moving in or --

10 A. It was before --

11 Q. -- or sometime after moving in?

12 A. It was before moving in. We basically gutted
13 the house.

14 Q. Were the renovations complete at the time you
15 moved into the home --

16 A. Yes.

17 Q. -- as far as the flooring goes? I'm sorry.

18 A. Mm-hmm.

19 Q. Miss Addison, where did you grow up?

20 A. In Pittsfield, Massachusetts.

21 Q. Did you spend any time near Silver Lake when
22 you lived in Pittsfield?

23 A. Did I spend time near it? Can you --

24 Q. Yeah.

25 A. -- clarify the question?

1 Q. Sure.

2 Well, do you recall did you ever drive by
3 Silver Lake? Did you live near Silver Lake?

4 A. It was -- Silver Lake --

5 MS. JOSELSON: Object.

6 But you can answer.

7 A. If I'm remembering it right, because I might
8 not be, I think that was over near GE, and I
9 lived in West Pittsfield, which was on the
10 other side of town. So I probably drove by it
11 on my way to Allen Dale section of town.

12 BY MS. SCHWARZ:

13 Q. And have you heard of the GE Pittsfield
14 Housatonic River environmental issues?

15 A. Yeah.

16 Q. Can you tell me what you know about that?

17 A. I believe there is and has been an issue with
18 PCBs -- PCP, PCB -- I might be saying it
19 wrong -- in the river.

20 Q. And how did you come to know that?

21 A. Just awareness growing up in Pittsfield.

22 Q. Other than your understanding or -- you
23 believe that it might have been an issue with
24 PCBs, is there anything else that you can tell
25 me about the site?

1 MS. JOELSON: Object to the form.

2 A. I'm not sure I understand the question.

3 BY MS. SCHWARZ:

4 Q. Sure.

5 Is there anything else that you recall or
6 that you know about sort of in general the
7 Housatonic River, Pittsfield site?

8 MS. JOELSON: Objection.

9 A. When you say site, I'm not sure what you mean
10 by that.

11 BY MS. SCHWARZ:

12 Q. Oh, sure.

13 A. Because the Housatonic River is a whole river.

14 Q. Right.

15 A. So what site do you mean?

16 Q. The -- so I'm asking specifically about the
17 contamination.

18 Is there anything else that you know
19 about it, other than fact that it might be
20 related to PCBs?

21 A. No.

22 MS. JOELSON: Objection.

23 BY MS. SCHWARZ:

24 Q. And what's the highest level of education that
25 you obtained?

1 A. I have a bachelor's degree.

2 Q. In what?

3 A. Social work. It's actually sociology, slash,
4 social work.

5 Q. And where did you go to college?

6 A. College of Saint Rose in Albany, New York.

7 Q. Did you attend graduate school?

8 A. I did not.

9 Q. Did you take any classes?

10 A. No.

11 Q. You may have mentioned this, but where do you
12 currently work?

13 A. At United Counseling Service.

14 Q. Where is that located?

15 A. It is on Dewey Street in Bennington.

16 Q. Can you just generally describe your
17 responsibilities there?

18 A. I'm the director of human resources.

19 Q. Okay. And day to day what is it that you do
20 as director of human resources at United
21 Counseling Services of Bennington?

22 A. I would say personnel management, recruitment,
23 staffing, benefits, employee engagement and
24 retention, staff development and training,
25 problem solving.

[illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 Q. How long have you worked at the United
7 Counseling Services?

8 A. Since April of 2011.

9 Q. And prior to United Counseling Services where
10 did you work?

11 A. At Northeast Career Planning.

12 Q. And where is that located?

13 A. Their -- their administrative main building is
14 in Menands, New York.

15 Q. Approximately how long would your commute be
16 from North Bennington to Menands?

17 A. About 47 minutes.

18 Q. And what was your title at Northeast Career
19 Planning?

20 A. When I left, it was director of employment
21 services.

22 Q. Would that have been in 2011?

23 A. Yes.

24 Q. And when you started, what was your title?

25 A. Job placement assistant.

1 Q. In what year?

2 A. That was in 1983.

3 Q. 1983?

4 A. Yes.

5 Q. Good for you.

6 Can you just sort of -- let's start with
7 in 1983, approximately what were your job
8 duties at Northeast Career Planning?

9 MS. JOSELSON: Object.

10 A. So my role was to help people with
11 disabilities obtain employment.

12 BY MS. SCHWARZ:

13 Q. When you say people on disabilities, were they
14 residents of Menands?

15 A. No. No.

16 Q. Okay.

17 A. They may have been, but it was not excluded by
18 that, you know, where they lived.

19 Q. And what was your next title?

20 A. I believe it was job placement counselor.

21 Q. And approximately what year were -- were you
22 promoted -- well, you were director of, did
23 you say, human resources in 2011?

24 A. No. Director of employment services.

25 Q. Employment services.

1 And what year did you acquire that title?

2 A. My final title?

3 Q. Yes.

4 A. I know that that was one of the questions that
5 we supplied to you, so I'm -- I would probably
6 be more accurate to check with that, but I
7 think I held that title for about four or five
8 years before I left.

9 Q. Okay. And did your work at Northeast Career
10 Planning require you to travel?

11 A. We had multiple worksites -- office locations,
12 so I would travel between office locations.

13 Q. So from 2008 to 2011, while you were at
14 Northeast Career Planning, you would be
15 commuting approximately 47 minutes from your
16 home at Asa's Way?

17 A. At the time I -- there was a period of time
18 where I had an office in Troy, which made the
19 commute a little bit shorter. I think I could
20 do it in about 41 minutes.

21 Q. You mentioned multiple sites that you would go
22 see. Was that -- was that on a daily basis?

23 A. No. It would -- it would depend on whether I
24 had meetings with staff. It was a large
25 department. So depending on, you know, where

1 there might be a need, a meeting, a purpose, I
2 would go between any number of locations in
3 the greater Albany region. Sometimes it
4 involved driving up to offices that we had in
5 the greater Saratoga region, as well.

6 Q. Did you have an office where you were based
7 out of?

8 A. Mm-hmm.

9 Q. And where was that?

10 A. Where was that?

11 Q. Yes.

12 A. That changed, too, over the 27 years I was
13 there. So depends on when you're talking.

14 Q. Sure. How about between 2008 and 2011?

15 A. Between 2008 and 2011. I can't recall exactly
16 when I moved to the Troy office. Prior to
17 that I was at our Colbin Avenue office in
18 Albany, I think. And I'm sorry, I'm not
19 exactly remembering when my office changed. I
20 just know when I left it was in -- it was out
21 of Troy.

22 Q. No need to apologize.

23 A. It may have been our Schenectady office, and
24 then I moved to Troy, but I'm really not
25 remembering.

1 Q. Okay. And how about prior to Northeast Career
2 Planning, where did you work?

3 A. So prior to Northeast Career Planning I was in
4 college. So it was the jobs that we provided,
5 to the best of my recollection. So it was in
6 between semesters part-time jobs so...

7 Q. And one of -- I believe one of the responses
8 you provided was that -- a nurses aide at
9 Springside Nursing Home.

10 Does that sound accurate?

11 A. Mm-hmm, mm-hmm.

12 Q. That was in Pittsfield --

13 A. Yes.

14 Q. -- Massachusetts?

15 A. Yes.

16 Q. And do you recall what you did as a nurses
17 aide?

18 MS. JOELSON: Objection.

19 A. We would help bathe elderly residents, help
20 dress and bring their food. That sort of
21 thing.

22 BY MS. SCHWARZ:

23 Q. And you moved into your current home at 35
24 Asa's Way, you said, in approximately December
25 of 2008, right?

1 A. Mm-hmm, yes.

2 Q. Was construction complete on your home when
3 you moved in?

4 A. When you say construction, what do you mean?

5 Q. Was there anything that was, you know, was not
6 yet -- unfinished, so to speak?

7 MS. JOELSON: Objection.

8 A. The core building was complete, but we've
9 added and enhanced and done things over the
10 years that we've been there, so I don't know
11 if that quite answers your question.

12 BY MS. SCHWARZ:

13 Q. Sure. Do you have a basement at 35 Asa's Way?

14 A. It's -- the house is built into a hill, so I
15 don't consider it a basement. There's a
16 garage and a ground floor where we have a
17 family room. So it's not a basement where
18 you're going under the ground. It's built
19 into a hill, so I would consider it a ground
20 floor.

21 Q. At the time you moved in in 2008 into 2009,
22 was there any renovations or any construction
23 that was going on while you were living in the
24 home?

25 A. So let's see, I'm trying to recall when we

1 put -- we put solar panels up. We put a shed
2 in the backyard. I don't recall what years we
3 did those. That's all I can remember.

4 Q. Okay. And prior to the detection of PFOA in
5 North Bennington, were you aware of the former
6 Saint-Gobain or ChemFab facility on Water
7 Street?

8 A. I know of -- I know of the building because I
9 would drive by it. I didn't know what its
10 history or, you know, manufacturing was, no.

11 Q. Had you heard of ChemFab at the time?

12 MS. JOELSON: Objection.

13 BY MS. SCHWARZ:

14 Q. I'm sorry. Withdrawn.

15 Had you heard of ChemFab prior to the
16 discovery of PFOA in North Bennington?

17 A. I don't -- I don't know.

18 Q. Had you heard of Saint-Gobain Performance
19 Plastics?

20 MS. JOELSON: Objection.

21 A. I -- I don't -- I don't know in 2008 if I --
22 if I knew of them.

23 BY MS. SCHWARZ:

24 Q. At any time prior to the detection of PFOA?

25 A. I don't think so, no.

1 Q. Had you heard of the former ChemFab facility
2 at 108 North Side Drive?

3 MS. JOELSON: Objection. When?

4 BY MS. SCHWARZ:

5 Q. Prior to the detection of PFOA in North
6 Bennington?

7 A. No.

8 Q. How far approximately do you live from the
9 Bennington landfill?

10 A. Driving or, like, point to point?

11 Q. Let's start with driving.

12 A. Let's see, driving it's approximately, I'd
13 say, about a mile and a half-ish. Maybe two
14 miles-ish.

15 Q. At the time you moved in in 2008, did you have
16 any concerns about your proximity to the
17 Bennington landfill?

18 A. No.

19 Q. As you sit here today, do you have any
20 concerns about your proximity to the
21 Bennington landfill?

22 A. I have concerns about my proximity to anyplace
23 that's contaminated with PFOA. So I would say
24 that, yeah, I'm -- I'm concerned about being
25 close to PFOA.

1 Q. Is it your understanding that the Bennington
2 landfill is contaminated with PFOA?

3 MS. JOELSON: Objection.

4 A. If I am recalling conversations about that
5 area, I -- I believe that there is
6 contamination in that region.

7 BY MS. SCHWARZ:

8 Q. When you say conversations -- and again, I
9 don't want to know anything that you would
10 have discussed with your attorneys, but what
11 are you referring to? Conversations with who?

12 A. It seems like I recall at public meetings
13 maybe some disputes over how certain chemicals
14 got into the landfill. I could be
15 misremembering. So if I am, I's just trying
16 to recollect.

17 Q. Do you recall any other locations in
18 Bennington that are contaminated with PFOA?

19 MS. JOELSON: Objection.

20 A. I'm sorry, could you say that again?

21 BY MS. SCHWARZ:

22 Q. Sure.

23 To your knowledge, do you know of any
24 other locations that are contaminated with
25 PFOA in Bennington?

1 MS. JOSELSON: Same objection.

2 A. So there's a large area of contamination in
3 Bennington, so there is a wide area of
4 contamination. So address by address by
5 address, I wouldn't be able to answer that.
6 But there's a large zone of contamination
7 that's been identified in maps and provided
8 and shown, and it's all over the place around
9 here.

10 BY MS. SCHWARZ:

11 Q. What's your understanding of zone of
12 contamination?

13 A. My understanding of zone of contamination,
14 that term has been used to designate on a map
15 maybe some demarcations of areas where there
16 has been testing in well water above 20 parts
17 per trillion, and the zone of contamination
18 was then kind of drawn following where it's
19 been found.

20 Q. I'm sorry. I didn't hear that last part. The
21 zone of contamination was what?

22 A. Where PFOA contamination has been found.

23 Q. And when you say contamination, can you just
24 tell me what you mean by that?

25 MS. JOSELSON: Objection.

1 A. Toxic poisoning by PFOA is what I mean by
2 that.

3 BY MS. SCHWARZ:

4 Q. You mentioned that the zone of contamination
5 it's -- you mentioned maps that were handed
6 out.

7 Do you recall that?

8 MS. JOSELSON: Objection.

9 A. Pardon me?

10 BY MS. SCHWARZ:

11 Q. Do you recall testifying that there were maps
12 that were handed out in connection with the
13 zone of contamination?

14 A. So I think at public meetings they were on
15 display. I'm trying to remember if they had
16 handouts that also contained them. So if I
17 misspoke, I'm trying to recall if they were
18 just on an overhead and projected, but I
19 believe they -- they're available. So if I
20 say handed out, I don't know if I personally
21 have one.

22 Q. Do you have an understanding of who prepared
23 those maps?

24 A. I believe they were prepared by Richard
25 Spiese's group that -- the state Department

1 of -- I think Environmental Conservation, but
2 I might have their acronym wrong.

3 Q. Richard Spiese is with the Vermont Department
4 of Environmental Conservation, if you know?

5 A. I don't -- I don't know. I'm remembering -- I
6 might not be remembering at what company he
7 works for, but, yeah, Richard Spiese, his
8 group.

9 Q. Spiese. Thank you.

10 A. Yeah.

11 Q. And did Mr. Spiese and his group also tell you
12 that the contamination was toxic poisoning?

13 A. No. Those are my words that I chose to use.
14 They may have used the word toxins though in
15 presentations.

16 Q. Do you associate toxic poisoning with any
17 particular level of PFOA?

18 A. Yeah, I think I would.

19 Q. And -- and what level would that be?

20 MS. JOELSON: Objection. Calls for
21 expert opinion.

22 A. In -- in my mind being somebody who has it in
23 her body, I would say anything over
24 background, anything over background.

25 BY MR. WILSON:

1 Q. What do you understand the background to be?

2 A. Two point something.

3 Q. And what are you basing that on?

4 A. What am I basing --

5 Q. The background --

6 A. -- the background?

7 Q. Mm-hmm.

8 A. I believe that was information that was
9 provided at public meetings, and that was the
10 basis, I think, for determining whether you
11 had elevated levels.

12 Q. Public meetings that you -- you mentioned, are
13 those the same as Richard Spiese and his group
14 or different meetings?

15 MS. JOELSON: Objection.

16 A. At -- at meetings often there was
17 representatives from the Department of Health,
18 and I believe it was information from the
19 Department of Health that was provided that
20 explained background versus elevated levels.
21 And sometimes -- often -- or most often it was
22 the -- the Vermont departments that I
23 mentioned, as well as DOL presenting -- not
24 DOL, Department of Health.

25 BY MS. SCHWARZ:

1 Q. You mentioned elevated levels in your blood;
2 is that right?

3 A. Yes.

4 Q. When did you have your blood tested for PFOA?

5 A. It was June or July of last year, I believe it
6 was. It may have been May.

7 Q. June or July -- or I'm sorry -- May, June,
8 July of 2016?

9 A. It was -- I participated with the rounds that
10 Department of Health provided, and I think
11 that they rolled those out last -- I'm not
12 remembering now, I'm sorry, but might have
13 been 2016, summer of 2016.

14 Q. And the meetings that you mentioned, would
15 those have been after you had your blood
16 tested or --

17 MS. JOELSON: Objection.

18 A. So the meetings occurred from February of 2016
19 all the way through the most recent one was a
20 couple months ago, I think. It was at
21 Bennington College, so there's been many.

22 BY MS. SCHWARZ:

23 Q. Shift gears back to your home.

24 Do you keep a garden at your home at 35
25 Asa's Way?

1 A. Yes.

2 Q. And is it just one?

3 A. We have four raised beds.

4 Q. And where on the property are the -- are the
5 raised beds?

6 A. Directionality I'm going to get wrong, but
7 it's just kind of off to the side kind of
8 along our property line -- close to the edge
9 of our property line.

10 Q. Are they all together or spread out across the
11 property?

12 A. No. They're four kind of side by side with a
13 little walking path in between them so we can
14 walk in between or mow or whatever.

15 Q. And what do you grow?

16 A. What do we grow now?

17 Q. Yes.

18 A. It changes slightly year to year. We put in
19 potatoes, and then usually cherry tomatoes,
20 some green peppers, maybe some hot peppers.

21 Q. And how large are the raised beds?

22 A. I think they're about four by six. Might be
23 three by five each.

24 Q. And has what you've grown in your garden
25 changed?

1 A. Yes.

2 Q. Okay. And how has it changed?

3 MS. JOELSON: Objection.

4 A. So I can say that -- going to get emotional.
5 I'm not as into it anymore.

6 BY MS. SCHWARZ:

7 Q. Want to take a little break?

8 A. I'm not -- no, I'm okay. I don't think I'm
9 into gardening anymore because I'm concerned
10 about contaminated soil. I'm not as
11 interested in producing things that we're
12 going to eat. We plant the potatoes because
13 it's fun for the grandkids to dig up.

14 I used to take great pleasure in my
15 garden before PFOA. I learned to can. I used
16 to do a lot with zucchinis and vegetables and
17 onions, and I used to have fun doing herbs.
18 It -- it's -- has a different meaning now. So
19 it's changed significantly to me.

20 Q. When did you purchase the raised beds?

21 A. I think it was in 20 -- I think we might have
22 had one in 2016, and then in 2017 we only used
23 raised beds.

24 Q. And was that because of PFOA?

25 A. Yes.

1 Q. Have you ever had your soil tested for PFOA?

2 A. No.

3 Q. And the soil that's now used in raised beds,
4 where did that come from?

5 A. I don't recall. We purchased it and brought
6 it in. I'm not sure if Jim, my husband, got
7 it at Home Depot or if we got it from a local
8 gardener, but we brought the soil in.

9 Q. And why did you purchase soil to bring in?

10 A. Because I didn't want to use our soil, our
11 ground soil. Although we did not test our
12 property, soil in the zone of contamination
13 was tested and found to contain PFOA, so we
14 brought in new soil.

15 Q. What's your understanding that there has been
16 soil testing in the zone of contamination that
17 resulted in elevated PFOA levels?

18 MS. JOELSON: Objection.

19 A. Can you repeat the question?

20 BY MS. SCHWARZ:

21 Q. Sure. Is -- is it your understanding that the
22 soil was tested within the zone of
23 contamination and showed PFOA?

24 A. Yes. The -- yes.

25 Q. What's your basis for that belief?

1 A. We were presented with that information at a
2 town meeting. There's PFOA in the soil.

3 Q. And where in the zone of contamination was
4 there PFOA detected in the soil?

5 MS. JOSELSON: Objection.

6 A. I would need to refer to documents that were
7 presented to us that I don't know where they
8 took samples, but samples were taken. It was
9 tested and found to have PFOA, including going
10 up to White Rocks. And there was studies done
11 by Bennington College, and that was presented
12 to us at a meeting.

13 BY MS. SCHWARZ:

14 Q. Why didn't you test your ground soil for PFOA?

15 A. I don't have the financial resources to do it.

16 Q. Have you researched how much it cost to do
17 that?

18 A. No.

19 Q. You testified that your husband purchased the
20 soil that's currently in the raised beds; is
21 that correct?

22 A. Yes.

23 Q. But you know -- you still don't plant your
24 vegetables; is that -- am I getting that
25 accurate?

1 MS. JOSELSON: Objection.

2 A. I plant some vegetables.

3 BY MS. SCHWARZ:

4 Q. Okay. And why don't you plant what you used
5 to?

6 A. Because it's not as fun anymore.

7 Q. Are you concerned about PFOA being in the
8 soil?

9 A. I'm -- I'm not concerned about PFOA being in
10 the soil that we've purchased. I just don't
11 enjoy my garden the way I used to. So I don't
12 do it as much.

13 Q. Why don't you enjoy it the way you used to?

14 A. I'm not -- why don't I enjoy it the way I used
15 to? I think ultimately when I garden it just
16 reminds me that we've been contaminated. I
17 guess I -- maybe it's -- maybe it's a feeling,
18 I don't know. I don't know how to answer
19 that.

20 Q. How often do you water your garden?

21 A. We water the garden probably once a day.

22 Q. I assume not in the winter; is that --

23 A. We -- no, we don't have a garden in the
24 winter.

25 Q. So about how many months out of the year would

1 you water the garden?

2 A. We have a garden June through August-ish, and
3 we probably don't water it as much when it
4 starts to fizzle away.

5 Q. So currently where does the water come from
6 that you water the garden?

7 A. We have a hose, and we have the POET system,
8 so it's filtered water.

9 Q. Prior to the detection of PFOA in well water,
10 where did that water come from?

11 MS. JOSELSON: Objection.

12 A. Say that again. I'm sorry.

13 BY MS. SCHWARZ:

14 Q. Sure. Where did -- did that change at all as
15 far as the source of the water that you would
16 use to water your garden?

17 MS. JOSELSON: Objection.

18 A. So we didn't have a POET system before the
19 contamination, so we'd use the hose to water
20 the garden.

21 MS. JOSELSON: I'd like to take breaks
22 every hour, so you just decide when it's a
23 good time.

24 MS. SCHWARZ: This is -- this is fine.

25 We can take a quick break.

1 THE VIDEOGRAPHER: The time is now
2 approximately 10:28 a.m. Going off the
3 record.

4 (Brief recess taken.)

5 THE VIDEOGRAPHER: The time is now
6 approximately 10:41 a.m. Going back on the
7 record.

8 BY MS. SCHWARZ:

9 Q. Miss Addison, are you ready to continue?

10 A. Yes.

11 Q. I apologize. I may have overlooked this at
12 the beginning, but if you ever need a break,
13 just let me know. This is not meant to be a
14 test of endurance at all. So if you need one
15 just -- just let us know. Okay?

16 A. Okay.

17 Q. All right. We were talking about your garden
18 before we took a break.

19 What would it take for you to feel
20 comfortable using your garden again?

21 A. Probably not being on that property. We --

22 Q. I'm sorry. Did you start to say something?

23 A. I started to but I'm not.

24 Q. Have you considered selling your property?

25 A. Not at this time.

1 Q. Have you considered selling it at a later
2 date?

3 A. There's a possibility that when we retire, we
4 may want to downsize.

5 Q. Have you considered selling your property
6 because of the PFOA that was detected in your
7 well water?

8 A. I don't consider that a possibility at this
9 time.

10 Q. Why is that?

11 A. Because there's no hookup to clean water yet.

12 Q. What do you mean by clean water?

13 A. Municipal water.

14 Q. You currently have a POET installed; is that
15 correct?

16 A. Yes.

17 Q. And do you believe the POET is effective in
18 filtering out any PFOA --

19 MS. JOSELSON: Objection.

20 BY MS. SCHWARZ:

21 Q. -- in your well water?

22 A. I'm not confident with the POET system. I
23 know it gets tested.

24 Q. You've consented to being hooked up to
25 municipal water; is that correct?

1 A. Yes.

2 Q. Do you have any sense of when that will
3 happen?

4 A. I do not know exactly.

5 Q. Have any of your neighbors, to your knowledge,
6 been hooked up to municipal water?

7 A. I don't know.

8 Q. Have you discussed the PFOA detection or PFOA
9 in general with any of your neighbors?

10 A. Have I --

11 MS. JOSELSON: Objection.

12 A. Have I discussed PFOA in general with my
13 neighbors?

14 BY MS. SCHWARZ:

15 Q. Yes.

16 A. Yes.

17 Q. What were -- what neighbors did you discuss
18 PFOA with?

19 A. There's a couple of neighbors on Susan Taylor
20 Lane and a couple of neighbors down the road
21 that I've had conversations with.

22 Q. And who did you speak with on Susan Taylor
23 Lane?

24 A. The Camelios, Kobiks, Sandy and Marie-Pierre.

25 Q. Are those the Sumners?

1 A. Yes.

2 Q. How about -- I'm sorry, I missed -- what --
3 what road did you mention?

4 A. Susan Taylor Lane.

5 Q. And --

6 A. And down my -- my own road.

7 Q. Oh, on Asa Way?

8 A. On Asa's Way.

9 Q. Asa's. And what neighbors on Asa's Way did
10 you discuss PFOA with?

11 A. I think the Joneses were at a meeting at the
12 Camelios' house that we had. They actually
13 might be on Royal Street. And then another
14 neighbor down from them.

15 Q. And in general what was the nature of your
16 discussions about PFOA?

17 A. Maybe just sharing information about when
18 meetings were, what we were going to do to try
19 to remediate the situation, maybe sharing
20 information that people might have, you know,
21 gotten at a public meeting about the subject.

22 Q. Did I understand you correctly is it your
23 understanding you don't believe you can sell
24 your home until it's connected to municipal
25 water?

1 A. Yeah.

2 MS. JOSELSON: Objection.

3 BY MS. SCHWARZ:

4 Q. So you've discussed selling your home with
5 your husband?

6 A. No, that's not what I said.

7 Q. I apologize.

8 A. That's all right.

9 Q. I didn't mean to suggest that.

10 Did you -- have you had any discussions
11 with your husband about selling your home?

12 A. No. We -- well, we don't have plans to sell
13 the home, so that's kind of a moot point.

14 Q. And is the reason that you don't have plans to
15 sell your home because it's not connected to
16 municipal water?

17 MS. JOSELSON: Objection.

18 A. We don't plan on selling the home right now
19 because we're living there now. We wouldn't
20 probably want to sell the house until we
21 retire-ish, but just not under the radar.

22 BY MS. SCHWARZ:

23 Q. You talked about your gardening.

24 Do you -- do you entertain in your home?

25 A. Not often.

1 Q. Approximately how often would you say?

2 A. Maybe when the family visits.

3 Q. Your children?

4 A. So -- yeah, my children.

5 Q. And I believe you said your son visits once

6 a -- once a year; is that --

7 A. Approximately.

8 Q. Do you otherwise entertain at your home?

9 A. Not often.

10 Q. When you do, is it indoor?

11 A. It would probably depend on the time of year.

12 So if it's winter, it'd be indoor.

13 Q. Do you ever work from home?

14 A. Very rarely.

15 Q. Do you have a home office?

16 A. No.

17 Q. When -- when you do work from home, where --

18 where do you work, in the house that is?

19 A. I might sit at the kitchen table with my

20 laptop.

21 Q. Do you have a -- a yard, a backyard in your

22 home?

23 A. Yes.

24 Q. And do you -- how do you use the backyard in

25 general, if at all?

1 MS. JOSELSON: Objection.

2 A. I hang laundry outside.

3 BY MS. SCHWARZ:

4 Q. On a clothesline?

5 A. We have a clothesline. I have a chair. I sit
6 outside in nice weather. We have dogs. Take
7 the dogs outside.

8 Q. Do you have a -- a dog run?

9 A. No.

10 Q. Backyard have grass or --

11 A. Yes.

12 Q. Okay. How about do you have a front yard?

13 A. Sort of. It's built on a hill. It's more
14 driveway in front of the house, and then on
15 the side there's some, so I don't really
16 consider it like a front yard, per se. It's
17 kind of a slope that comes down.

18 Q. And on the sides is it grassy?

19 A. Yes.

20 Q. Miss Addison, when did you first hear about
21 PFOA?

22 A. I think it was in February of 2016.

23 Q. And what did you hear about it?

24 A. That PFOA had been detected in well water.

25 Q. When you say well water, are you referring to

1 your own well water, or is it general?

2 A. Well water in certain homes near the old
3 ChemFab building.

4 Q. When you say the old ChemFab building, what --
5 what location are you referring to?

6 A. The one in North Bennington.

7 Q. And in February of 2016, did you learn that
8 your well water had PFOA?

9 A. No.

10 Q. What was the context of how you heard about it
11 in February of 2016?

12 MS. JOELSON: Objection.

13 A. There was a public meeting at the firehouse,
14 and it was announced by legislators or
15 representatives. Department of Environmental
16 Conservation had that meeting.

17 BY MS. SCHWARZ:

18 Q. And did you take any action based on what you
19 learned in February of 2016 at that meeting?

20 A. Sure.

21 Q. And what did you do?

22 A. Stopped -- what actions? I tried to get as --
23 information. I attended the meetings that
24 were available and followed the
25 recommendations.

1 Q. And whose recommendations were you following?

2 A. Those who presented at that meeting. I think
3 it was the Environmental Conservation people.

4 Q. And what recommendations did they offer?

5 A. To drink the -- the potable water that they
6 were bringing in, and they set up sites to do
7 that.

8 Q. Would you elaborate a bit more on -- on the
9 water they were bringing in?

10 A. So I think at the time they advised to, if you
11 were on a well, to drink bottled water or to
12 bring containers to the big tanks that they
13 had set up, and they started supplying water.

14 Q. Did you bring containers to the wells -- I'm
15 sorry -- did you bring containers to the tanks
16 they had set up?

17 A. We -- no. We went to -- there was a couple
18 markets that had water you could go and get.

19 Q. So you would pick up bottled water on, was it
20 on a weekly basis?

21 A. No, it was probably more often than that.

22 Q. And was -- was it you that primarily picked up
23 the bottled water or your husband or a
24 combination?

25 A. Both of us.

1 Q. And what market did you pick up the water
2 from?

3 A. There was a market on -- in North Bennington,
4 Bennington Variety. I don't remember the name
5 of it. It might have been North Bennington
6 Variety.

7 Q. Do you drink bottled water today?

8 A. Yes.

9 Q. And are you purchasing it or --

10 A. It's delivered to us.

11 Q. And when did you set up the deliveries of the
12 bottled water?

13 A. We didn't set it up. It was set up by the
14 state. We just had to call and -- so as soon
15 as it was available to us to be -- to be
16 delivered, we called.

17 Q. And after the -- the POET was installed in
18 your home, you continued to drink bottled
19 water?

20 A. Yes.

21 Q. Why was that?

22 A. We were not confident with the POET system.
23 There was originally arsenic in the filtering
24 systems, which was concerning to us. The E.
25 coli unit that -- there was a -- a vacuum

1 tube -- there was some kind of tube that
2 corrects potential E. coli that broke, so we
3 weren't confident that the system was
4 failproof, so we drink bottled water.

5 Q. Prior to installation of the POET on your
6 property, had you tested your well for E.
7 coli?

8 A. We had whatever testing was needed to move in
9 with a well. I don't know.

10 Q. What was the nature of the testing that was
11 needed to move in?

12 A. I don't know. We --

13 Q. And that would have been done in approximately
14 2008?

15 A. If -- if there were tests. I'm assuming there
16 was a well water test to move in, but I don't
17 really know.

18 Q. And prior to the POET being installed on your
19 property, did you -- have you tested your well
20 water for arsenic?

21 A. No.

22 Q. To your knowledge, have you tested your well
23 water at all between 2008 and today?

24 A. Have we tested our well water?

25 Q. Yes.

1 A. Or has the state?

2 Q. Have you.

3 A. Have we ourselves? No. We get the results.

4 Q. And prior to PFOA being detected in your well
5 water, had you tested it?

6 A. I don't know.

7 Q. When did you learn that there was PFOA
8 detected in your well water?

9 A. I think we got our results March.

10 Q. March of 2016?

11 A. Of 2016.

12 Q. And when did you have your blood tested for
13 PFOA?

14 A. I think earlier when we spoke about that. It
15 was when they offered those first rounds. I
16 think it was May or June.

17 Q. And who performed that blood test?

18 A. Department of Health.

19 Q. Do you recall receiving your results?

20 A. I do.

21 Q. Do you recall what the results were?

22 A. Yes.

23 Q. And what were they?

24 A. My level at the time was 40.9.

25 Q. 40.9 parts per trillion?

1 A. Yes.

2 MS. JOELSON: Objection.

3 BY MS. SCHWARZ:

4 Q. And what, if anything, were you told about
5 your results when you received them?

6 A. I believe I recall a letter coming with it.

7 MR. SILVER: Can I ask you just to
8 clarify? When you were asking the results
9 parts per trillion, were you talking about
10 blood levels or were you --

11 MS. SCHWARZ: Oh, yeah.

12 MS. SILVER: -- talking about --

13 MS. SCHWARZ: The -- her serum levels.

14 MS. JOELSON: Yes, it's not tested in
15 parts per trillion.

16 MS. SCHWARZ: Did I -- yeah, did I say --

17 MR. SILVER: It's micrograms --

18 MS. SCHWARZ: Yes.

19 MS. SILVER: -- per liter, I believe.

20 MS. SCHWARZ: Right, which is parts
21 per billion.

22 BY MS. SCHWARZ:

23 Q. Miss Addison, when you received your results,
24 you said you testified there was a letter that
25 accompanied them; is that right?

1 A. I believe there was.

2 Q. And what did that letter say?

3 A. I don't recall.

4 Q. Did it provide any information with respect to
5 what your results mean?

6 A. I believe it did.

7 Q. Do you have any recollection of -- of what
8 that was?

9 A. I'm sorry?

10 Q. Do you have any recollection of what it did
11 say about your results and what they meant?

12 A. It meant that it was elevated.

13 (Deposition Exhibit No. 1 was marked for
14 identification.)

15 Q. Miss Addison, the court reporter is handing
16 you what's been marked as Exhibit 1, to your
17 deposition. Take a moment to look at the
18 document. Let me know if you recognize it.

19 A. (Witness complying) Yes.

20 Q. What do you recognize it to be?

21 A. Declaration of me in support of plaintiffs'
22 motion for a class certification.

23 Q. Did you prepare this document?

24 A. This document was prepared by my attorneys on
25 my behalf.

1 Q. Did you review the information in it to make
2 sure it was accurate?

3 A. I did.

4 Q. And is that your signature at the bottom of
5 page 3?

6 A. Yes.

7 Q. And if I may ask you to turn to page 2,
8 paragraph 6. And it says there: As a result
9 of the elevated levels of PFOA in my blood
10 serum, I am concerned about my increased risk
11 of developing medical conditions and/or
12 diseases associated with PFOA exposure and
13 seek the establishment of a medical monitoring
14 fund to pay for the necessary testing and
15 early detection of such conditions for myself
16 and all those in Bennington and North
17 Bennington exposed to PFOA by drinking well
18 water contaminated with PFOA.

19 Did I read that correctly?

20 A. Yes.

21 Q. What is your understanding of the medical
22 conditions or diseases associated with PFOA?

23 A. My understanding is that PFOA can have a bad
24 impact on one's body in multiple areas of
25 concern.

1 Q. Can you elaborate on a bad impact?

2 A. It can lead to high cholesterol, from what I'm
3 gathering, testicular cancer, issues with
4 liver, bladder, kidney I believe. It might be
5 something with low birth weight babies, and
6 I'm sure there's others that I'm not
7 remembering, but those are the ones that stand
8 out to me.

9 Q. And what are you basing that on?

10 A. Which part? I'm sorry.

11 Q. What's your basis for believing that it leads
12 to high cholesterol, or problems with your
13 liver, bladder, kidney or any other organs?

14 A. From information that I've been provided.

15 Q. And who provided that information to you?

16 A. I believe it was the Department of Health.

17 Q. Was the information in the form of studies?

18 A. I can't recall exactly. I can't recall it
19 exactly.

20 Q. Have you done any independent research?

21 A. I've read some studies.

22 Q. And were those studies provided to you or --
23 or did you find them on your own?

24 A. I found them.

25 Q. How did you find those studies?

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A horizontal bar chart titled "Percentage of respondents who believe the U.S. should take action to address climate change". The chart displays data for two main categories: "Age" and "Gender". Each category is further divided into sub-groups. The bars are black, and the chart includes a legend for "Age" and "Gender". The x-axis represents the percentage of respondents, ranging from 0 to 100. The y-axis lists the categories and sub-groups. The data shows that a majority of respondents in all groups believe the U.S. should take action to address climate change, with the highest percentages in the "Age 18-29" group and the "Male" group.

Category	Sub-Group	Percentage
Age	18-29	85%
	30-49	75%
	50-69	70%
	70+	65%
Gender	Male	80%
	Female	75%
	Non-binary	70%
	Transgender	65%

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[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 BY MS. SCHWARZ:

8 Q. Okay. If we could turn back to your
9 declaration.

10 Do you understand yourself to be
11 representing the exposure class in this
12 litigation?

13 A. Yes.

14 Q. And what do you understand that to mean?

15 A. I'm a member of the class with elevated levels
16 of exposure in my blood based on the testing,
17 and that is similar to other people who have
18 been similarly impacted by PFOA exposure.

19 Q. You testified that you -- you're a member of
20 the class -- of the exposure class; is that
21 correct?

22 A. Yes.

23 Q. Do you understand yourself to be representing
24 the exposure class?

25 A. Yes.

1 Q. Do you have an understanding as to whether you
2 have additional responsibilities as a class
3 representative of the exposure class?

4 A. Yes.

5 Q. And what -- what's the nature of those
6 responsibilities that you have?

7 MS. JOELSON: Objection.

8 A. Things like I'm doing today, things like the
9 documents that we've produced, responding to
10 your requests.

11 BY MS. SCHWARZ:

12 Q. Do you understand yourself to be representing
13 the property damage class in this action?

14 A. Yes.

15 Q. And what do you understand property damage
16 class to mean?

17 A. I understand that to mean people who have been
18 similarly impacted by PFOA exposure to our
19 community in the zone of contamination.

20 Q. If we could unpack that a bit.

21 What do you remember by people that have
22 been similarly impacted in the zone of
23 contamination?

24 MS. JOELSON: Objection.

25 A. I mean that to mean that I live in a community

1 that has been exposed to PFOA, directly,
2 indirectly, in your property, your neighbors'
3 property.

4 BY MS. SCHWARZ:

5 Q. And when you say community, are you talking
6 about North Bennington or the North Village or
7 something else -- something else?

8 A. I mean the zone of contamination, our
9 community. I guess I'm using that word
10 specifically and broadly.

11 Q. What's your understanding of the boundaries of
12 the zone of contamination?

13 MS. JOELSON: Objection. Asked and
14 answered. You can answer it again.

15 A. Could you ask me again? I'm sorry.

16 BY MS. SCHWARZ:

17 Q. Sure. What's your understanding of the
18 boundaries of the zone of contamination?

19 A. I'm not able to answer that specifically,
20 because I don't know if that's a legal term
21 that you're using or if it's a term in the
22 case; but I can refer to a map, and I see
23 lines that are drawn and -- so I -- there's
24 some boundaries on it.

25 Q. And is it your understanding that you're

1 representing anyone within the zone of
2 contamination, as you understand that term?

3 MS. JOELSON: Objection.

4 A. Yes.

5 (Deposition Exhibit No. 2 was marked for
6 identification.)

7 Q. Miss Addison, you've been handed what's been
8 marked as Exhibit 2 to your deposition. Take
9 a moment and let me know if you recognize that
10 document.

11 A. I recognize the document.

12 Q. What do you recognize it to be?

13 A. This is my written notes from a testimony that
14 I provided to the Vermont Senate of Natural
15 Resource and Energy Committee when they
16 visited Bennington College.

17 Q. Did you prepare this testimony?

18 A. I did.

19 Q. Did anyone help you to prepare the testimony?

20 A. No.

21 Q. If I could point you to the second paragraph.
22 It says, almost one year ago I was presented
23 with the realization that my property and my
24 beautiful home were forever changed. I'm
25 absolutely heartbroken.

1 Did I read that correctly?

2 A. Yes.

3 Q. I learned that PFOA is in my well and in my
4 drinking water. This was soon followed by
5 learning that PFOA is in my body and that of
6 my spouse and my children.

7 Did I read that correctly?

8 A. You did.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Category	Value
1	10
2	25
3	95
4	90
5	15
6	5
7	85
8	75
9	5
10	75
11	100
12	55
13	5
14	80
15	5
16	60
17	70
18	45
19	95
20	10
21	5
22	5
23	5
24	5
25	5

[illegible]

Category	Value (approximate percentage)
1	85
2	98
3	55
4	68
5	35
6	78
7	82
8	15
9	90
10	85
11	35
12	92
13	85
14	35
15	95
16	35
17	98
18	35
19	15
20	95
21	45
22	15
23	85
24	98
25	88

24 A. So there's two parts. One having to do with
25 our property, property diminution, impact on

1 our community, loss of property value, loss of
2 enjoyment and use. And then the other part is
3 to receive medical monitoring.

4 Q. What do you understand the term medical
5 monitoring to mean?

6 A. So medical monitoring would be a comprehensive
7 and intentional protocol for people who have
8 PFOA exposure above background level who are
9 within the zone of contamination to receive
10 annual specific testing by practitioners who
11 are specifically trained in chemical exposure
12 so that we can be medically monitored for, I
13 believe, up to 30 years.

14 Q. And what's your basis for that understanding?

15 A. The explanation that was provided to me by my
16 attorneys.

17 Q. To your knowledge, are the ultrasounds and
18 blood tests that you had that were -- that
19 were ordered by Dr. Wood part of this medical
20 monitoring that you discussed?

21 A. No.

22 MS. JOELSON: Objection.

23 BY MS. SCHWARZ:

24 Q. And why not?

25 A. There's not a medical monitoring system set up

1 yet. She -- so it would not be part of the
2 medical monitoring.

3 Q. And what's -- what's your understanding of
4 what the lawsuit is alleging that Saint-Gobain
5 did wrong?

6 A. Saint-Gobain released a toxic chemical into an
7 environment in such a way that it is in my
8 body, my yard, my community, my neighbors'
9 yards, our children.

10 Q. And what's your basis for that understanding?

11 A. What's -- I'm sorry. I'm confused with the
12 question.

13 Q. Sure. What -- what are you basing that on?

14 A. I have PFOA in my body.

15 Q. And I apologize I wasn't specific enough.

16 What are you basing Saint-Gobain's
17 conduct on? Did you read about it somewhere?
18 Did you discuss it?

19 MS. JOELSON: Objection.

20 A. I'm sorry --

21 BY MS. SCHWARZ:

22 Q. So let me rephrase.

23 A. Yeah.

24 Q. Sure.

25 A. Okay.

1 Q. How did you come to form the belief that
2 Saint-Gobain released, I believe you
3 testified, a toxic chemical?

4 A. From meetings that I've attended. That's what
5 I've learned.

6 Q. So what -- what meetings specifically are you
7 referring to that you've attended that said
8 that Saint-Gobain released a toxic chemical
9 into the environment?

10 MS. JOSELSON: Asked and answered. You
11 can answer it again.

12 THE WITNESS: I didn't hear what you
13 said. I'm sorry.

14 MS. JOSELSON: I said asked and answered,
15 but you can answer it again if you understand
16 it.

17 A. So meetings that were provided by the
18 Department of Environmental Conservation, as
19 well as community college or at the Bennington
20 College.

21 BY MS. SCHWARZ:

22 Q. And at these meetings, you learned or you were
23 told that Saint-Gobain released a toxic
24 chemical into the environment; is that
25 correct?

1 A. That PFOA was released into the environment.

2 Q. Okay. How did you come to form the belief
3 that Saint-Gobain released PFOA into the
4 environment?

5 MS. JOSELSON: Objection.

6 A. From my understanding of the ownership of the
7 plant.

8 BY MS. SCHWARZ:

9 Q. What are you relying on for your understanding
10 of the ownership of the plant?

11 A. Based on what I've read, what I've gathered at
12 public meetings.

13 Q. What did you read?

14 A. That ChemFab produced a product that was
15 released.

16 Q. And I'm sorry, what -- and when you say that
17 you've read it, are you referring to media
18 articles?

19 A. I don't recall exactly.

20 Q. Would it be a newspaper?

21 A. I would say public meetings mostly.

22 Q. The reading material you mentioned, is that
23 from anything that was handed out at these
24 public meetings?

25 A. I don't recall exactly.

1 Q. And what's your understanding of the relief
2 that you're seeking in this case?

3 A. My understanding is that there has been
4 diminished property value, negative impact on
5 use of our homes and properties and then
6 monetary resources to provide the medical
7 monitoring.

8 Q. Focusing on the -- the property, the
9 diminished property value and the negative
10 impact, what's the -- what's the relief that
11 you're asking for to address both of those
12 issues?

13 A. When you say relief, are you -- I'm not sure
14 what you're asking when you say relief.

15 Q. Sure. Are you seeking compensation in some
16 form? Are you seeking some -- what's the
17 recourse that you're asking the Court to
18 provide in this case with respect to the
19 property damage?

20 A. Yes. It would be monetary to be made whole
21 again.

22 Q. And what would it take for you to be made
23 whole again?

24 MS. JOSELSON: Objection. Calls for a
25 legal conclusion.

1 You can answer it, if you understand it.

2 A. I'm not able to answer that.

3 BY MS. SCHWARZ:

4 Q. Do you have any understanding of what you're
5 asking the court to provide by way of --

6 A. Being made whole again?

7 Q. Yeah.

8 A. Can you ask the question differently because
9 I'm -- I'm trying to formulate my thoughts,
10 but I'm not exactly sure what you're looking
11 for?

12 Q. Sure. So you testified that there were two
13 parts as far as your understanding goes to the
14 lawsuit, correct?

15 A. Yes.

16 Q. And we've talked about the medical monitoring
17 portion?

18 A. Mm-hmm. Mm-hmm.

19 Q. And you're seeking a medical monitoring fund,
20 correct?

21 A. Mm-hmm.

22 Q. And then the other part is diminished property
23 values and negative impact; is that correct?

24 A. Mm-hmm, yes.

25 Q. And I don't think we've discussed, and that's

1 what I'm trying to find out, is what exactly
2 you're seeking from the court to address the
3 diminished property value and negative impact.

4 MS. JOELSON: Same objection.

5 You can answer.

6 A. I feel as though I have been unfairly
7 assaulted with a chemical that I didn't ask to
8 have in my yard, my body, our properties.
9 It's impacted my home value; it's impacted my
10 quality of life; it may impact my future in a
11 significant way. So I am hoping to be made
12 whole.

13 BY MS. SCHWARZ:

14 Q. To be made whole, would that -- would that be
15 monetary compensation?

16 A. I believe so, in addition to medical
17 monitoring.

18 Q. And I believe you mentioned that you --
19 your -- you believe you were unfairly
20 assaulted with a chemical in your yard and
21 your body; is that accurate?

22 MS. JOELSON: Objection.

23 A. Are you asking me if that's what I said?

24 BY MS. SCHWARZ:

25 Q. Yes. Did I write that down --

1 A. I believe that's what I said.

2 Q. Okay. And what did you mean with respect to
3 your yard?

4 A. My groundwater is no longer usable.

5 Q. Okay. So you're referring to your well?

6 A. It -- no, that's not what I said.

7 Q. Okay.

8 A. It's not just my well. It's my groundwater.
9 It's my soil, my property and my use and
10 enjoyment of that.

11 Q. You testified earlier you've never tested the
12 soil on your property; is that correct?

13 MS. JOSELSON: Objection. Asked and
14 answered.

15 A. Correct.

16 MS. SCHWARZ: Good time for a break?

17 MS. JOSELSON: Sure.

18 (Off-the-record colloquy.)

19 THE VIDEOGRAPHER: The time is now 11 --

20 (Off-the-record colloquy.)

21 THE VIDEOGRAPHER: The time is now
22 approximately 11:31 a.m. Going off the
23 record.

24 (Brief recess taken.)

25 THE VIDEOGRAPHER: The time is now

1 approximately 11:40 a.m. Going back on the
2 record.

3 BY MS. SCHWARZ:

4 Q. Miss Addison, are you ready to continue?

5 A. Yes.

6 Q. We're going to mark Exhibit 3 to your
7 deposition.

8 (Deposition Exhibit No. 3 was marked for
9 identification.)

10 Q. Miss Addison, you've been handed Exhibit 3 to
11 your deposition.

12 You can take a moment and let me know if
13 you recognize it.

14 A. Yeah.

15 Q. What do you recognize it to be?

16 A. Third Amended Complaint Class Action Jury
17 Trial Demand document.

18 Q. Have you seen this document before?

19 A. Yes.

20 Q. If you could turn to paragraph 5 on page 3?

21 A. (Witness complying)

22 Q. That last sentence there states: As a result
23 of the contamination of their private drinking
24 well water, groundwater and soil, Mr. Sullivan
25 and Ms. Addison have suffered, amongst other

1 damages set out herein, diminution in property
2 value, loss of use and enjoyment of property,
3 annoyance, upset, aggravation, and
4 inconvenience.

5 Did I read that correctly?

6 A. Yes.

7 Q. Do you agree with that statement?

8 A. I do.

9 Q. And we'll get into the diminution in property
10 value claims a bit later, but can you tell me
11 generally describe how your property value has
12 been diminished?

13 MS. JOSELSON: Objection.

14 A. I currently have to drink bottled water to
15 feel confident that I'm drinking clean water.
16 My groundwater has been contaminated. I can
17 no longer use the well on my property. Our --
18 the soil's contaminated. My POET system has
19 failed as far as the UV thing breaking, so I
20 don't have confidence in that.

21 BY MS. SCHWARZ:

22 Q. Anything else?

23 A. Yeah. I feel like because of this
24 contamination, which has been widely
25 publicized, our community has been

1 stigmatized, which is also impacting on my
2 property value.

3 Q. You testified that your -- your POET failed.

4 Is it your understanding that the POET
5 currently is not in working order?

6 A. What I -- to clarify what I said, the UV
7 component broke a couple months into using it,
8 and I don't know whether that caused us to
9 have E. coli contamination as -- when that --
10 during the period that that wasn't working.
11 That's what I meant.

12 Q. And was -- was it fixed, to your knowledge?

13 A. It was fixed.

14 Q. And who fixed it?

15 A. I don't recall.

16 Q. Was it you or your husband?

17 A. No, we didn't fix it. The people who handle
18 the POET systems fix it.

19 Q. You mentioned E. coli contamination as a
20 potential concern when the UV light was not
21 working; is that correct?

22 A. I don't know how the equipment works. I just
23 know that it was removed -- a part of it was
24 removed.

25 Q. And the --

1 A. The part -- when the part needed to be
2 replaced, it wasn't there. So therefore the
3 system was not working the way it should have
4 been.

5 Q. And prior to having a POET installed on your
6 property, were you filtering out the E. coli
7 that could potentially be in your water?

8 MS. JOELSON: Objection.

9 A. My understanding is that they have the -- the
10 E. coli is part of the POET system to
11 counteract some of the filtration system
12 that's in the POET itself.

13 BY MS. SCHWARZ:

14 Q. You never tested your well water previously
15 for E. coli, right?

16 MS. JOELSON: Objection.

17 A. So I think I recalled when you asked me
18 before, whatever the well testing was that was
19 required before you moved in is what we did,
20 but I think I -- I'd refer back to what I said
21 prior respectfully.

22 BY MS. SCHWARZ:

23 Q. Would you elaborate a bit on how you
24 experienced annoyance, upset, aggravation, and
25 inconvenience?

1 A. So you've seen my testimony as presented. I
2 think that that's a summary, but I can tell
3 you that there is worry for my -- there's
4 worry for my health. My hobbies have changed.
5 I no longer have joy in my gardening. I don't
6 have the same joy in canning. I don't have
7 the same confidence in things that I grow.
8 I'm inconvenienced the many, many times I've
9 run out of bottled water because the delivery
10 was late. I'm reminded when I go in my
11 backyard and I see my well thing sticking out
12 of the yard that it goes into a contaminated
13 pool of groundwater that I once loved. It's
14 very sad. The groundwater will not be the
15 same in my lifetime.

16 Q. And how do you know that?

17 A. From what I've learned, the half life of PFOA
18 is such -- well, I'm not a scientist. It's
19 going to be in groundwater for a very long
20 time.

21 Q. Your well has been -- oh, I'm sorry.

22 MS. JOSELSON: Wait a minute.

23 BY MS. SCHWARZ:

24 Q. I apologize.

25 A. So I've been stigmatized by this. I'm

1 concerned when my family visits that they're
2 afraid to be at my house. I'm afraid that
3 will cause them to not want to visit.

4 I have fear for my health. I have fear
5 for my retirement security financially,
6 because I don't know what the impact of this
7 whole thing is going to be on me.

8 It's had a very big impact on my ability
9 to enjoy and live the way I used to before
10 PFOA contamination and exposure.

11 BY MS. SCHWARZ:

12 Q. Your -- your well water has been tested for
13 PFOA after that initial test result, right?

14 A. Mm-hmm, yes.

15 Q. And to your knowledge, is PFOA currently in
16 your drinking water?

17 MS. JOELSON: Objection.

18 A. So PFOA, we are tested on a cycle. They have
19 to replace the filter on some kind of a
20 frequency. I don't know whether, when they
21 replace that filter, whether there's leakage
22 coming in. I know that there's still PFOA in
23 the groundwater and they change my filter, but
24 I don't know at that juncture whether they're
25 timing it right. I don't know.

1 BY MS. SCHWARZ:

2 Q. Have any of the test results indicated PFOA in
3 your drinking water?

4 MS. JOELSON: Objection.

5 A. They test when they replace --

6 BY MS. SCHWARZ:

7 Q. Mm-hmm.

8 A. -- right? So actually I don't -- I don't -- I
9 don't know. I'm not able to answer that. I'm
10 sorry. Not able to answer that.

11 BY MS. SCHWARZ:

12 Q. To your knowledge --

13 A. To my knowledge when they get -- get the test
14 results, there's PFOA coming into the house.
15 I'm not confident because of the timing. I
16 know on the day that they take that sample
17 what the PFOA is coming into the house. I'm
18 not confident on the days getting close to the
19 filter change that there's not PFOA coming in.
20 That's the best way I can answer that.

21 Q. If I'm understanding you correctly, on the day
22 that they take that sample and they test, does
23 that test indicate non-detect levels of PFOA?

24 A. On the day --

25 MS. JOELSON: Objection.

1 A. On the day that they test, yes, of the PFOA
2 out -- coming out of the -- I mean the water
3 coming through the PFOA. I'm sorry. I'm
4 getting all tongue tied. It's -- it's
5 non-detect after the POET on the day that they
6 test.

7 BY MS. SCHWARZ:

8 Q. And how often do they test?

9 A. I believe they've tested it about five times.

10 Q. And when was the most recent time that they
11 tested the POET?

12 A. They came about two weeks ago, and I have not
13 gotten those results yet.

14 THE VIDEOGRAPHER: The time is now
15 approximately 11:50 a.m. This completes disc
16 No. 1 one of the deposition of Leslie Addison.

17 Going off the record.

18 (Lunch recess taken.)

19 (Deposition Exhibit No. 4 was marked for
20 identification.)

21 THE VIDEOGRAPHER: The time is now
22 approximately 12:46 p.m. Going back on the
23 record with disc No. 2 of the deposition of
24 Leslie Addison.

25 BY MS. SCHWARZ:

1 Q. Miss Addison, we just returned from a lunch
2 break.

3 Are you ready to continue?

4 A. Yes.

5 Q. Great. I'm going to hand you what's been
6 marked as Exhibit -- Exhibit 4 to your
7 deposition.

8 THE WITNESS: Thank you.

9 BY MS. SCHWARZ:

10 Q. Take a moment and let me know if you recognize
11 the document.

12 A. Yeah.

13 Q. And what do you recognize it to be?

14 A. It's an e-mail from my neighbor.

15 Q. And is that Sandy Sumner?

16 A. Yes.

17 Q. And Mr. Sumner starts the e-mail off with
18 North Villagers.

19 Do you see that?

20 A. Yes.

21 Q. Is that the name of sort of your neighborhood,
22 the North Village?

23 A. There's a subsection of that upper part of the
24 hill. I don't know anything more about the
25 designation than that.

1 Q. I just want to -- is that a formal name for
2 it, or is that just something that the
3 neighbors kind of --

4 A. I don't know where it came from. There's --
5 might be a little sign there.

6 Q. Okay. And I just wanted to go through some of
7 these names and see if they were your
8 neighbors and kind of what -- what the e-mail
9 is about generally.

10 Is that okay?

11 A. Sure.

12 Q. Okay. Great. So --

13 MS. JOELSON: I just want to note that
14 this is one of the documents that's marked
15 confidential, so we'll be proceeding pursuant
16 to the --

17 MS. SCHWARZ: Absolutely.

18 MS. JOELSON: -- agreement.

19 MS. SCHWARZ: Yeah.

20 BY MS. SCHWARZ:

■ ■ [REDACTED]
■ [REDACTED] ■
■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]

[illegible]

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1 I believe you -- I apologize. Withdrawn.

2 I believe that you testified that
3 you did -- you've had meetings, right, with
4 your neighbors about PFOA; is that correct?

5 A. Yes.

6 Q. Okay. Would these have been the neighbors
7 that you met with to discuss PFOA in general?

8 A. Because I don't know all of them on here, I
9 can't say that they were in a meeting that I
10 was at because I don't know some of these
11 e-mail addresses. Some were at meetings that
12 I attended, yes.

13 Q. Did you ever have a meeting in your home with
14 your neighbors to discuss PFOA?

15 A. I would want to look back at my notes because
16 there were a lot of meetings and
17 conversations, so I wouldn't be able to say
18 without my -- my log.

19 Q. Okay. And I know you said that you -- you
20 couldn't really tell whether you met with this
21 group because some of the e-mail addresses
22 weren't clear as to who -- who they were,
23 correct?

24 A. Can you rephrase the question?

25 Q. Sure. I asked -- I had asked you if you'd

1 previously discussed PFOA in general with this
2 group of people, and I believe your testimony
3 was that you weren't sure because it wasn't
4 clear from the e-mail address who some of the
5 individuals were.

6 A. So I think --

7 Q. So I get that --

8 A. I think what I meant was I wasn't able to
9 answer your question the way it was worded
10 because the exact composition of a meeting may
11 or may not have been comprised of these exact
12 people.

13 Q. Right.

14 A. I was at meetings with my neighbors --

15 Q. Yeah. No, I think I --

16 A. -- many of whom are here, so just to clarify
17 that answer.

18 Q. Yeah, no, I appreciate it. I think that I
19 understood you correctly, but let's go through
20 the -- the ones that you could identify based
21 on the e-mail addresses if we could.

22 Have you met with Todd Kobik to discuss
23 PFOA?

24 A. Yes.

25 Q. And have you met with Jeff Whitesell?

1 A. Yes.

2 Q. Have you met with anyone from Blue Heron
3 Construction?

4 A. Yes.

5 Q. And who would that be?

6 A. Jim Goodine.

7 Q. Have you met with Mr. and Mrs. Ridley?

8 A. Yes.

9 Q. And have you met with Shaina Kasper?

10 A. Yes.

11 Q. The group of people that we just discussed,
12 were those meetings -- did you have multiple
13 meetings?

14 A. There was a -- was there more than one
15 meeting?

16 Q. Yes.

17 A. There was more than one meeting.

18 Q. And would they be at specific locations?

19 A. Were they at specific locations?

20 Q. Were they at a specific location or did it
21 vary?

22 A. It -- they were not at the same location, no.
23 I'm trying to remember when they where, but
24 where exactly I'm not -- I'd have to look at
25 that list again.

1 Q. How frequently did you meet with your
2 neighbors to discuss PFOA?

3 A. Again, I'd have to look at the list because
4 there wasn't a regular frequency. So without
5 looking at that list, it would be hard to
6 answer, but it seemed like it was probably
7 three or four times at different neighbors' --
8 that I was in a meeting with different
9 neighbors, different combination.

10 Q. And what time frame are you -- are you talking
11 about when you say you met with different
12 neighbors in combination three or four times?

13 A. Again, I would want to refer back to that
14 document to be accurate, but the first one was
15 probably within a month of discovering that
16 this PFOA exposure is -- was happening.

17 Q. And you referred to a list.

18 What list are you talking about?

19 A. I had supplied a list to my attorneys of
20 different meetings that I had attended.

21 Q. Okay. And how many times have you met with
22 Miss Shaina Kasper?

23 A. Well, when you say met with her, she was at a
24 meeting that I was at. Probably twice in
25 neighborhood meetings. She may have also been

1 at meetings that I was also at that were other
2 locations like at those town meetings.

3 Q. Can you tell me the general discussions that
4 you would have with your neighbors when you
5 had these meetings?

6 MS. JOELSON: Objection.

7 BY MS. SCHWARZ:

8 Q. What were you talking about?

9 A. What were we talking about?

10 Q. Yeah.

11 A. PFOA.

12 Q. Okay.

13 A. PFOA exposure, PFOA remediation, health
14 impact, and consoling each other.

15 Q. And the -- the three to four meetings that you
16 testified to previously, would they have
17 included the neighbors or the -- I'm sorry --
18 the individuals that were not your neighbors?

19 MS. JOELSON: Objection.

20 A. There -- there was not the same exact people
21 at each meeting. So when you say did it
22 involve the people who were not my
23 neighbors --

24 BY MS. SCHWARZ:

25 Q. Sure.

1 A. -- can you rephrase that question?

2 Q. I can try. You identified -- so, for example,
3 let's start with Mr. Goodine. He -- he was
4 not one of your neighbors, right?

5 A. Yeah.

6 Q. And was he at the three to four meetings that
7 you testified to earlier that you had with
8 your neighbors to discuss PFOA?

9 A. I don't recall if he was at each one.

10 Q. Would it be fair to say that the issues you
11 discussed then were not strictly limited to
12 those that affected your neighborhood, if Mr.
13 Goodine or anyone else that didn't live in the
14 neighborhood was present?

15 MS. JOSELSON: Objection.

16 A. Was it -- can you repeat the question?

17 BY MS. SCHWARZ:

18 Q. Sure. When you were discussing PFOA --

19 A. Yeah.

20 Q. -- were you discussing issues specific to your
21 neighborhood, or were you discussing it in
22 general?

23 A. Typically it was about our neighborhood, but
24 it -- it's hard to say that it didn't say,
25 yeah, this stinks for the whole community.

1 It -- it involved -- the neighborhood brought
2 us together, but, yeah, PFOA affected beyond
3 that. So the conversations would not just be
4 limited to our neighborhood.

5 Mr. Goodine owns property in our
6 neighborhood. He doesn't live there as a
7 neighbor.

8 Q. Mm-hmm. And does Miss Kasper live in your
9 neighborhood?

10 A. Who?

11 Q. Miss Kasper, Shaina Kasper?

12 A. Not that I'm aware of.

13 Q. And would she provide information from the
14 Toxics Action Center at the two meetings you
15 testified she attended?

16 MS. JOELSON: Objection.

17 A. I believe once she did about her organization,
18 and I don't recall if she did at another time.
19 I think she was also a listener.

20 BY MS. SCHWARZ:

21 Q. Do you recall who organized these meetings
22 typically?

23 A. No.

24 Q. Did you ever organize a neighbor meeting?

25 A. No, not that I can recall.

1 Q. Did your husband?

2 A. Not that I can recall.

3 Q. Did you discuss bringing a lawsuit during any
4 of these meetings with your neighbors?

5 A. Yes.

6 Q. Can you tell me specifically the neighbors
7 that you recall discussing bringing a lawsuit
8 with?

9 A. No, I wouldn't be able to recall the exact
10 composition of those meetings.

11 Q. Okay. Of the neighbors that were -- that you
12 discussed bringing a lawsuit with; is that
13 what --

14 A. That's a different -- I'm sorry, you worded it
15 differently so --

16 Q. Yeah. I said can you -- I said can you tell
17 me the specific neighbors that you did discuss
18 bringing a lawsuit with?

19 MS. JOELSON: Objection.

20 A. So that's a -- that's new question, right,
21 because you said -- before you were talking
22 about meetings and now you're asking who I had
23 conversations with about a lawsuit?

24 BY MS. SCHWARZ:

25 Q. I said -- I said meeting -- I just said

1 specific neighbors that you had meetings with.

2 A. Okay. I can tell you who I remembered being
3 there. I know that the Camelios were
4 involved, Sandy, Beckerman. I can't recall
5 beyond that.

6 Q. And did you have conversations with any other
7 neighbors that you didn't mention?

8 MS. JOELSON: Objection.

9 A. Conversations not at a meeting?

10 BY MS. SCHWARZ:

11 Q. Right. I think earlier you made a distinction
12 or you thought I made distinction with respect
13 to discussing it in a conversation versus
14 meeting to discuss the litigation -- or
15 bringing a litigation.

16 So I'm just asking --

17 A. It would be the same --

18 MS. JOELSON: Wait a minute. Let -- let
19 her ask her question.

20 A. Sorry.

21 BY MS. SCHWARZ:

22 Q. I'm just asking whether you had conversations
23 with neighbors in addition to the Camelios,
24 Mr. Sumner and Mr. Beckerman about commencing
25 litigation.

1 A. No. It usually -- conversations would --
2 would -- really when I'd see them would be at
3 a meeting.

4 Q. And when you -- when you did discuss
5 litigation --

6 A. I -- I need to correct that.

7 Q. Sure.

8 A. And there may have been some e-mail
9 communications, as well.

10 Q. About -- about what?

11 A. The litigation.

12 Q. Okay. And when you were discussing it, what
13 was the -- sort of the nature of the -- those
14 discussions?

15 MS. JOSELSON: Objection.

16 A. Do we want to and how to proceed.

17 BY MS. SCHWARZ:

18 Q. Were there different opinions on that?

19 A. Yes.

20 Q. Are the -- is Mr. Beckerman part of the class
21 action?

22 A. Yes.

23 Q. Are Mr. and Mrs. Camelio part of the class
24 action?

25 A. Yes.

1 Q. Is Mr. Goodine part of the class action?

2 A. Yes.

3 Q. And Mr. Whitesell?

4 A. Yes.

5 MS. SCHWARZ: I'm going to mark the next
6 exhibit.

7 (Deposition Exhibit No. 5 was marked for
8 identification.)

9 Q. Miss Addison, I'm handing you Exhibit 5 for
10 your deposition. Just take a moment and let
11 me know if you recognize it.

12 A. (Witness complying)

13 (Off-the-record colloquy.)

14 A. Yes, I recognize it.

15 BY MS. SCHWARZ:

16 Q. What do you recognize it to be?

17 A. It is First Set of Interrogatories to
18 Plaintiffs.

19 Q. And did you -- did you prepare responses to
20 this document?

21 A. I provided information to the attorneys who
22 provided this document on my behalf.

23 Q. I'm sorry. I didn't -- I didn't mean to
24 interrupt you.

25 A. On my behalf.

1 Q. And is that your signature on page 11?

2 A. Yes.

3 Q. Is there anything that you wish to correct in
4 the document?

5 A. I could only answer that by saying there's
6 been a lot of documents presented, so I would
7 leave anything to my attorneys to respond if
8 there was updates to this provided during the
9 last --

10 Q. Okay. If you go to page 7, please.

11 A. (Witness complying)

12 Q. Is this the -- the list that you had in
13 mind --

14 A. Yes.

15 Q. Okay. And in your -- could you explain what
16 this list is?

17 A. It was in response to identifying the answer
18 to No. 9.

19 Q. At each meeting that you -- you attended in
20 which there was discussion of PFOA, plaintiffs
21 allege property damage for this case.

22 Is that generally accurate?

23 A. Yes, it looks like you're reading from No. 9.

24 Q. Yeah.

25 A. Yes.

1 Q. So under your name on page 7, I want to -- if
2 you could turn your attention to, there
3 are two -- looks like two sort of listings for
4 May 2016.

5 Do you see that?

6 A. Yeah.

7 Q. And the first one --

8 A. Yeah.

9 Q. -- says the following: May 2016, dash, Jim
10 and I were asked to talk to T. J. Donovan,
11 Chittenden County District Attorney, who was
12 campaigning for Vermont attorney general and
13 trying to understand the PFOA situation from
14 the perspective of persons affected. We met
15 in Manchester, Vermont, at the Copper Grouse.

16 A. Copper.

17 Q. Is that grouse? Am I reading that correctly?

18 A. Yes.

19 Q. Did I read that correctly?

20 A. You did.

21 Q. What was the purpose of this meeting?

22 A. He was trying to understand the PFOA situation
23 and the impact from our perspective.

24 Q. And how -- did he -- did Mr. Donovan contact
25 you?

1 A. I believe a representative of Mr. Donovan
2 contacted Jim.

3 Q. And what was discussed at the meeting?

4 A. The impact on us as a person impacted by PFOA.

5 Q. Did -- did any other plaintiffs or class
6 members attend the meeting?

7 A. No.

8 Q. And did you discuss this litigation?

9 A. I don't recall all the details of the
10 conversation.

11 Q. And Mr. Donovan is now the state attorney
12 general; is that right?

13 A. I believe so.

14 Q. And have you or your husband spoken with Mr.
15 Donovan since May of 2016?

16 A. I don't recall -- the only time I might have
17 seen him he -- no, I'm going to say no. He
18 may have been at a public meeting once, but I
19 don't recall saying hello or acknowledging him
20 or anything like that.

21 Q. Other than the -- the meeting that you've
22 mentioned, did you have any other
23 communications or meetings with other class
24 members prior to commencing the lawsuit?

25 MS. JOELSON: Objection.

1 A. Other than this list right here, was there
2 other meetings that I have not disclosed?

3 BY MS. SCHWARZ:

4 Q. With other -- did you have conversations with
5 other class members not limited to -- to the
6 list now?

7 MS. JOELSON: Objection.

8 A. Did I have conversations with anybody in the
9 class about PFOA prior to --

10 BY MS. SCHWARZ:

11 Q. Commencing this lawsuit.

12 A. -- commercing this lawsuit?

13 Q. Yeah.

14 A. Yes.

15 Q. Do you recall who?

16 A. Not specifically.

17 Q. But your recollection is that they -- that
18 they weren't class members?

19 A. They were or were not?

20 Q. Were.

21 MS. JOELSON: Objection. You're asking
22 about class members before the lawsuit was
23 filed?

24 MS. SCHWARZ: I'm asking my question.

25 MS. JOELSON: Well, I object to the

1 form --

2 MS. SCHWARZ: Okay.

3 MS. JOELSON: -- since there can be no
4 class members before litigation is filed.

5 A. So I can say that when there's a gathering of
6 neighbors at a town meeting to talk about
7 potential contamination in their neighborhood
8 and I know they're neighbors of mine, I'm --
9 they were neighbors.

10 BY MS. SCHWARZ:

11 Q. And since commencing the lawsuit, have you had
12 any communications or meetings with other
13 class members?

14 MS. JOELSON: Objection.

15 A. I would have small talk conversations at
16 public meetings and then -- I mean, obviously
17 I've given this list of the meetings, but when
18 you say conversations --

19 BY MS. SCHWARZ:

20 Q. Mm-hmm.

21 A. -- would be casual conversations when I see
22 people at a public meeting.

23 Q. The very last entry there that starts: It's
24 3/15/2016 meeting with neighbors of the North
25 Village Development at John and Laurie

1 Camelio's house to discuss the contamination,
2 concerns, options, may also have been attended
3 by a representative from Toxic Action Network,
4 but I do not recall which of the neighbor
5 meetings they attended.

6 Did I read that correctly?

7 A. Yeah.

8 Q. What -- do you recall the options that you
9 discussed at this meeting?

10 A. Yes, very broadly. It's, you know, do you
11 want to act or not, how do you act, and with
12 whom, so --

13 Q. And what do you mean when you say act?

14 A. Do we want to bring a lawsuit or not.

15 Q. Were there other neighbors that attended this
16 meeting, if you recall?

17 A. Well, it was a meeting with neighbors, so
18 there were neighbors there.

19 When you say other neighbors, what do you
20 mean? I'm sorry.

21 Q. Do you recall anyone else at -- at this
22 meeting at Mr. and Mrs. Camelio's house?

23 A. So I can't recall specifically. I think I
24 kind of answered that in a previous question,
25 but that particular one I don't recall

1 exactly.

2 Q. On the next page there, page 8, the second
3 full entry. It's March 6th of 2016. PFOA
4 informational meeting, Hoosick Falls, dash,
5 community meeting hosted by Flint & Granish,
6 PLLC, Attorneys At Law. Guest speakers
7 included Richard Clapp, MHP, Harvard School of
8 Public Health, epidemiologist and PFOA expert.
9 Attended by me, Jim and other neighbors in the
10 North Village Development.

11 A. Yeah.

12 Q. Do you recall that meeting?

13 A. I do.

14 Q. And in general can you tell me what was
15 discussed at the meeting?

16 A. There was a public health person who talked
17 about PFOA. There was -- there was a legal
18 firm there who were there to offer their
19 support and services, but I don't recall
20 exactly what they presented.

21 I recall it more being just learning
22 about PFOA and then this epidemiologist
23 presenting.

24 Q. And what information did you receive from the
25 epidemiologist that was presenting?

1 A. I don't recall specifically, but he spoke
2 about PFOA exposure.

3 Q. Were -- did -- were there any handouts at the
4 this meeting, if you can remember?

5 A. Any handouts that I had I supplied to my
6 attorneys, so I would have to refer back to
7 the -- the books if I had anything.

8 Q. Have you ever had individual communications
9 with anyone at the Vermont DEC about PFOA
10 contamination?

11 MS. JOSELSON: Objection. Asked and
12 answered.

13 You can answer it again.

14 A. Yes.

15 BY MS. SCHWARZ:

16 Q. With whom?

17 A. Mr. Spiese.

18 Q. Anyone else?

19 A. I probably had kind words exchanged with the
20 commissioner at the time at a public meeting.
21 That's it.

22 Q. The individual communication with Mr. Spiese,
23 was that in person?

24 A. Yes.

25 Q. And did -- where -- where did that happen?

1 Where were you?

2 A. So there was a dialogue that I had with him at
3 a neighbor's home. I know I had conversations
4 with him when he came to the house to do
5 testing initially and again kind words in
6 passing if I'd see him at a public meeting.

7 Q. Did you have any individual communications
8 with anyone from the Vermont Department of
9 Health?

10 A. Yes.

11 Q. And what was the nature of those
12 conversations?

13 A. It was to advocate for additional blood draws
14 for kids who were away at colleges.

15 Q. Any -- anything else?

16 A. Establish -- making my own appointment. I had
17 to call them directly to make my appointment.
18 That's all can I recall. And, of course, I
19 talked to them when I had my blood drawn.

20 Q. Did you discuss the -- this litigation with
21 Mr. Spiese?

22 A. No.

23 Q. Did you discuss this litigation with anyone at
24 Vermont DEC?

25 A. No.

1 Q. Did you discuss this litigation with anyone at
2 Vermont DOH?

3 A. No.

4 Q. How about with Mrs. -- Ms. Lori Cragin?

5 A. I'm not recalling who Miss Cragin is. I'm
6 sorry.

7 Q. We're all set with that one.

8 Miss Addison, turning back to your home
9 at 35 Asa's Way.

10 Do you recall having it appraised in
11 2010?

12 A. Yes.

13 (Deposition Exhibit No. 6 was marked for
14 identification.)

15 Q. Okay. I'm going to hand you what's been
16 marked as Exhibit 6 for the deposition.

17 A. Thank you.

18 Q. Sure. Take your time.

19 Let me know if you've seen this document
20 before.

21 A. Did you mean to hand me two? You said
22 document 6.

23 Q. Thank you.

24 A. Okay.

25 Q. Have you seen this before?

1 A. Yes.

2 Q. When was the last time you saw this document?

3 A. I think I looked at it within the last month.

4 Q. Does this appear to be an appraisal report
5 from 2010?

6 A. Yes.

7 Q. And why did you have your home appraised in
8 2010?

9 THE WITNESS: Can we move this a tad
10 because it's blocking the light a little bit.
11 I'm having a hard time seeing the little
12 print. It's just a shadow or something here.
13 Is there a way to move that screen back?

14 (Off-the-record colloquy.)

15 BY MS. SCHWARZ:

16 Q. Why did you have your home appraised in 2010?

17 A. We were refinancing our mortgage.

18 Q. And do you recall the -- how much your home
19 was ultimately appraised for?

20 I can direct you to it. It says 3148 at
21 the bottom.

22 A. I'm sorry. Where are you looking at?

23 MS. JOSELSON: The Bates numbers at the
24 bottom, 3148 she's directing you to.

25 BY MS. SCHWARZ:

1 Q. Very bottom left-hand corner there.

2 A. The bottom left-hand corner I'm seeing not --
3 yes. Yes, on the bottom of 3148. Yes, I'm
4 seeing the appraisal.

5 Q. 325,000, is that what you're seeing?

6 A. I believe that's what I see. The lighting is
7 really bad here, I'm sorry, and with my
8 reading glasses, it's -- I think that's what
9 it says.

10 Q. That's what I see, too.

11 A. Okay.

12 Q. Do you recall whether this was the same amount
13 that you and your husband had spent to
14 construct the home?

15 A. It was not what we spent.

16 Q. Was that higher or lower?

17 A. It was lower.

18 Q. And did you express your opinion that it was
19 too -- the appraisal value was too low with
20 anyone?

21 MS. JOELSON: Objection.

22 A. Yes. Jim and I believed that it was too low,
23 and we expressed that to each other.

24 BY MS. SCHWARZ:

25 Q. Anyone -- anyone else?

1 A. No.

2 Q. Why not?

3 A. We were able to do the transaction that we
4 needed.

5 Q. And I'm going to hand you Exhibit 7 to your
6 deposition.

7 (Deposition Exhibit No. 7 was marked for
8 identification.)

9 Q. Do you recognize this document?

10 A. Yes.

11 Q. And what do you recognize it to be?

12 A. It's the 2012 appraisal of the home.

13 Q. And why was your home appraised in 2012?

14 A. We were refinancing again.

15 Q. And if I could direct you to page ending in
16 Bates No. 2958?

17 A. Yeah.

18 Q. Bottom left-hand corner there.

19 A. Yes.

20 Q. Do you see the value there?

21 A. Yes.

22 Q. And \$300,000 is the appraisal value.

23 A. That is.

24 Q. And that reflects a drop of 25,000 from the
25 appraisal two years prior?

1 MS. JOELSON: Objection.

2 A. Yes.

3 BY MS. SCHWARZ:

4 Q. Do you have an understanding as to the reason
5 for the decrease in value?

6 A. No.

7 MS. JOELSON: Objection.

8 BY MS. SCHWARZ:

9 Q. Did you ask anyone?

10 A. Did I ask anyone?

11 Q. Mm-hmm.

12 A. No.

13 Q. Have you ever appraised any property yourself?

14 A. No.

15 Q. Do you have any training or experience in real
16 estate appraisal?

17 A. I do not have formal training in real estate
18 appraisal, if that's what you're asking. I'm
19 sorry.

20 Q. Do you have informal training?

21 A. I have my -- I have what -- I -- I do not have
22 informal training. I have my opinion on my
23 home's value.

24 Q. Do you have any training in real estate sales?

25 A. No.

1 Q. Have you ever listed or sold a property?

2 A. No.

3 (Deposition Exhibit No. 8 was marked for
4 identification.)

5 Q. Miss Addison, you've been handed what's been
6 marked Exhibit 8 to your deposition. Take a
7 moment and let me know if you recognize the
8 document.

9 A. Yes.

10 Q. And what -- what do you recognize it to be?

11 A. It's a tax bill.

12 Q. I think if you go through the exhibit, it's
13 several tax bills, if you agree?

14 A. Yes, there are several tax bills.

15 Q. Are these tax bills that the Village of North
16 Bennington sent to you?

17 A. Yes.

18 Q. So on the first page there it says, 2013 to
19 2014 of the tax year in the box on the
20 left-hand side?

21 A. Mm-hmm.

22 Q. Would you agree that this is the tax bill for
23 the 2013 to 2014?

24 A. It appears to be.

25 Q. And just below your address there, see owner

1 and it lists Mr. Sullivan and yourself.

2 Do you see that?

3 A. Yes.

4 Q. And just below that it says assessed value?

5 A. Yes.

6 Q. And it says 243,100?

7 A. Yes, it's what it says.

8 Q. And if you look at the box on the right-hand
9 side at the top where it says, house site tax
10 information, the third line down says house
11 site value.

12 Do you see that?

13 A. I see it.

14 Q. And it says 243,100.

15 Do you see that?

16 A. I do see it.

17 Q. Okay. Do you think this accurately reflects
18 the value of your home in 2013 to 2014?

19 MS. JOSELSON: Objection.

20 A. I do not.

21 BY MS. SCHWARZ:

22 Q. Other than discussing it with your husband,
23 did you express -- either of you express that
24 opinion to any other -- anyone else?

25 A. No.

1 Q. Why not?

2 A. I didn't feel the need to do so.

3 Q. If you flip the page, it's the tax bill for
4 2014 to 2015.

5 I can direct you again to the value, that
6 they're in the same place under assessed value
7 there. It says 243,100.

8 Do you see that?

9 A. I do see it.

10 Q. And on the right-hand side in that box house
11 site value, also 243,100.

12 Do you see that?

13 A. I see it.

14 Q. And that's the same as it was in 2013 to 2014,
15 right?

16 A. I'm sorry?

17 Q. That's the same value or -- that we saw --

18 A. Yes.

19 Q. -- for 2013 to 2014?

20 A. Yes.

21 Q. And we -- we can walk through them and feel
22 free to do so, but I'll represent to you that
23 each year for 2015 to 2016, 2016 and 2017 has
24 the same house site value.

25 Do you have any reason to dispute that?

1 A. Is there any reason to dispute it with you
2 that that's what it says?

3 Q. Yes, yes, what the document says. And feel
4 free -- yeah, feel free to check it out.

5 A. That's what it says.

6 Q. And I imagine you continue to disagree with
7 that valuation?

8 A. I do.

9 Q. It does it remain the case that you haven't
10 challenged or contested the tax assessor's
11 valuation?

12 A. That is correct.

13 (Deposition Exhibit No. 9 was marked for
14 identification.)

15 Q. Miss Addison, you've been handed what's been
16 marked as Exhibit --

17 MS. JOSELSON: 9?

18 BY MS. SCHWARZ:

19 Q. -- 9 to your deposition.

20 Do you recognize this document?

21 A. Yes.

22 Q. And what do you recognize it to be?

23 A. Disclosure -- Fourth Supplemental Disclosures
24 on Merit Issues.

25 Q. And did you prepare this document?

1 A. My attorneys prepared the document.

2 Q. And at the bottom of the second page there, do
3 you see where it says, Plaintiffs Sullivan and
4 Addison will testify that the value of their
5 property, assuming no PFOA contamination from
6 defendant's operations, is 400 to 420,000.

7 Do you see that?

8 A. Yes.

9 Q. If I just stop there. So is it your testimony
10 that your home would be worth between 400 and
11 420,000 if there was no PFOA detected in the
12 well water?

13 A. Yes.

14 Q. And do you agree that number is approximately
15 75 percent higher than the value at the town
16 of Bennington has given your property for the
17 last four years based on the tax bills?

18 MS. JOELSON: Objection.

19 A. Is that 75? I'm not -- I'm not doing the
20 quick math. In reverse it's definitely
21 higher. I know what I -- I know what I paid
22 to buy my --

23 MR. SILVER: Just answer the question.

24 BY MS. SCHWARZ:

25 Q. And did you arrive at your opinion on the

1 value of your home on your own?

2 A. Yes, in consultation with my husband.

3 Q. Did you also consult a third party, or was it
4 just the two of you?

5 A. No. Jim -- Jim and I talked it through, and
6 we've had guidance from our attorneys in
7 general, but we have opinions on what we
8 believe our house to be worth.

9 Q. Can you tell me what was that value based on?

10 A. That was based on what it cost us to build the
11 property. It was based on enhancements that
12 we made to the property since we built the
13 house. It's based on our knowledge of our
14 neighborhood, the views, the -- the
15 construction material that were used, the
16 energy efficiency.

17 Q. And does the value reflect a comparison with
18 homes where PFOA hasn't been detected?

19 MS. JOSELSON: Objection.

20 A. I know what we paid to build the house. We
21 know the materials. We know the quality. We
22 know the quality of the builder itself. We
23 know what we put into it. This is what we
24 feel like our property is worth.

25 BY MS. SCHWARZ:

1 Q. Okay. Did you compare it to homes where PFOA
2 hadn't been detected to come up with this
3 value?

4 A. No.

5 Q. And I know you testified that you aren't a
6 license real estate appraiser, correct?

7 A. That's correct.

8 MS. JOSELSON: Asked and answered.

9 BY MS. SCHWARZ:

10 Q. Is your husband a licensed real estate
11 appraiser?

12 A. He is not.

13 Q. Is he a licensed real estate agent?

14 A. No.

15 Q. And do either of you have any experience
16 valuing real property?

17 MS. JOSELSON: Objection.

18 A. I don't know the term real property. When
19 you -- what do you mean? Can you quality
20 that?

21 BY MS. SCHWARZ:

22 Q. Do you have experience valuing a home?

23 MS. JOSELSON: Objection.

24 A. I am comfortable valuing my own home.

25 BY MS. SCHWARZ:

1 Q. Have you had experience doing that in the past
2 with any other home?

3 A. No.

4 Q. Going back to Exhibit -- Exhibit 6. It's
5 going to be the interrogatories.

6 We're going to go back to Exhibit 5 for
7 one moment.

8 Here you go, Miss Addison.

9 MS. JOELSON: Are those the
10 interrogatories? I didn't mark mine.

11 MS. SCHWARZ: I'm sorry?

12 MS. JOELSON: Are those the
13 interrogatories?

14 MS. SCHWARZ: Yes, the -- yes.

15 BY MS. SCHWARZ:

16 Q. If I can direct you, Miss Addison, to No. 2,
17 and there it says: For each property describe
18 the instances in which the value has been
19 assessed or determined, including the dates of
20 any valuations, identification of who
21 performed the valuations and the results of
22 any valuations.

23 Do you see that?

24 A. Yes.

25 Q. And in response to the interrogatory, do you

1 agree that you and your husband stated that
2 you had invested a total of \$483,500 in your
3 home?

4 A. Yes.

5 Q. And that represents the cost of the lot, Blue
6 Heron Construction's costs and the costs of
7 the additional components; is that accurate?

8 A. Yes.

9 Q. 483,500 is -- is higher than the value that
10 you gave your home in the fourth supplemental
11 initial disclosures that we just reviewed,
12 right?

13 A. Can you refer to what exhibit that is and I
14 can look at it with you?

15 Q. Sure. That was -- 9 was the last one. Yeah.
16 At the bottom of the second page there.

17 A. Oh, okay.

18 Q. Plaintiff Sullivan and Addison will testify --

19 A. Yeah.

20 Q. -- value assuming no PFOA contamination.

21 A. Yeah.

22 Q. There it's between 400 and 420,000.

23 A. Right.

24 Q. Right? So that's lower than the number we see
25 here --

1 A. Right.

2 Q. -- in response to the first interrogatories,
3 which is 469,800?

4 A. Yeah.

5 MS. JOSELSON: Objection.

6 BY MS. SCHWARZ:

7 Q. Do you believe your home is worth less in
8 value today compared to what you've invested
9 in it?

10 A. I believe my house to be worth what is in my
11 disclosure here now had it not been for PFOA.

12 And, I'm sorry, can you repeat the
13 question? I don't think I answered it.

14 Q. Sure. So is -- is it your belief today that
15 your home is worth less than what you have put
16 into it?

17 A. Yes. Today I think my house is worth a lot
18 less than I put into it because right now we
19 don't have clean -- don't have municipal
20 water.

21 Q. The value that you estimated between that --
22 between 400 and 420,000, that value is what
23 you estimated without PFOA?

24 A. Yes.

25 Q. Right?

1 A. Yes.

2 Q. And that's still lower than the value that we
3 see here, which is 469,800, right?

4 MS. JOSELSON: Asked and answered. And
5 that's not what -- you're not correctly
6 quoting the interrogatory answer.

7 But you can answer if you understand it.

8 A. Can you repeat the question?

9 BY MS. SCHWARZ:

10 Q. Sure.

11 Miss Addison, in response to
12 interrogatory No. 2 there, the last
13 sentence --

14 A. Mm-hmm.

15 Q. -- total investment by the owners in the
16 property is approximately 483,500.

17 A. Yes.

18 Q. Consistent with the insured value of 460 --
19 469,800 --

20 A. Yes.

21 Q. -- which is adjusted for inflation --

22 A. Yes.

23 Q. -- doesn't include the lot or site
24 improvements.

25 A. Yes.

1 Q. Do you agree with that figure, that \$483,500
2 reflects the total investment by you and Mr.
3 Sullivan?

4 A. Yes.

5 Q. Do you also agree that that number is higher
6 than what you estimated in response to our
7 interrogatory -- supplemental disclosures
8 bottom of page 2 where you valued it between
9 400 and 420,000 without PFOA?

10 MS. JOELSON: I think that's about the
11 fourth time you asked that question.

12 MS. SCHWARZ: It's the fourth time you've
13 interrupted me. It's just a form objection.

14 MS. SILVER: You're -- you're conflating
15 estimated investment with value. It's
16 different.

17 MS. SCHWARZ: Are you -- are you
18 testifying?

19 MS. JOELSON: How many times do you want
20 to ask this question?

21 MS. SCHWARZ: The objection is form.
22 That's it.

23 MS. JOELSON: How many times do you want
24 to ask it?

25 MS. SCHWARZ: The objection is form. We

1 can ask the judge what he thinks -- the
2 objection is form.

3 MS. JOELSON: I can make any objections
4 I wish.

5 How many times do you intend to ask the
6 same question?

7 MS. SCHWARZ: No, I'm not -- you can ask
8 me that when you take my deposition.

9 MS. JOELSON: Same objection I made
10 through the other times you've asked the
11 question. It's been asked and answered.

12 You can answer it again if you understand
13 what she's asking you, but if you don't, then
14 don't.

15 MS. SCHWARZ: Can you stop coaching the
16 witness, Miss Joselson?

17 MS. JOELSON: I am not coaching the
18 witness.

19 MS. SCHWARZ: You are. You certainly
20 are.

21 A. I can answer it by saying that this page has a
22 different number than this page.

23 BY MS. SCHWARZ:

24 Q. Okay.

25 MS. SCHWARZ: We're all set with those.

1 (Off-the-record colloquy.)

2 Q. Miss Addison, approximately how many other
3 homes are in your neighborhood?

4 A. I'm not able to answer that, not knowing what
5 you mean by neighborhood.

6 Q. So let's start with your street.

7 How many other homes are on Asa Way?

8 A. On Asa's Way?

9 Q. Mm-hmm.

10 A. One, two, three -- one, two, three, four,
11 five, six -- six.

12 Q. Are there additional lots that are empty?

13 A. Yes.

14 Q. How many lots -- how many additional lots are
15 on Asa's Way?

16 A. One -- three definite. There may be one more.

17 Q. Were -- were all the homes on your street
18 built in the same year as your home?

19 A. I can't answer that. I don't know.

20 Q. Have you been in any of your neighbors' homes?

21 A. Yes.

22 Q. And by neighbors -- I'm sorry.

23 Have you been in any of your neighbors'
24 homes on Asa's Way?

25 A. Yes.

1 Q. Would you say all of the homes on Asa's Way
2 are the same type as yours?

3 MS. JOSELSON: Objection.

4 A. What do you mean by type?

5 BY MS. SCHWARZ:

6 Q. I mean is -- are they made out of the same
7 material, as far as you know?

8 A. I don't know what they're made out of.

9 Q. Are they all the same size?

10 A. I -- I don't know their size.

11 Q. Do they -- do they all have the same
12 properties -- the size of the lots of each of
13 the homes, do they have the same size
14 backyard?

15 MS. JOSELSON: Object.

16 A. I don't know their lot size.

17 BY MS. SCHWARZ:

18 Q. The homes that you've been in, do they have
19 the same materials inside that you used when
20 constructing your home?

21 MS. JOSELSON: Objection.

22 A. I -- I didn't ask them what materials they
23 used when they constructed their home.

24 BY MS. SCHWARZ:

25 Q. Did you observe any?

1 A. I was in one of my neighbor's kitchen. I
2 don't recall looking closely what the building
3 materials were.

4 Q. Do you have air -- central air in your home?

5 A. No.

6 Q. Do you have window units?

7 A. We have -- no. Not window units. They're
8 built -- they're individual things built in to
9 the wall.

10 Q. And that's for air conditioning?

11 A. Yes.

12 Q. Can you just elaborate a little bit more or --

13 A. I'm sorry. In the bedrooms it's an air
14 conditioning unit.

15 Q. And what type of heating system do you have?

16 A. We have a pellet stove, and then we have
17 oil -- we have oil heat that generates coils
18 under the floor. I'm not calling it the right
19 name. And then we have radiators in the
20 upstairs bedrooms.

21 Q. Would you describe it as a custom design?

22 MS. JOELSON: Objection.

23 BY MS. SCHWARZ:

24 Q. Did you design that yourself with your
25 husband?

1 A. I don't -- can you clarify the question?

2 Q. Sure. It just sounds like a complicated
3 heating system.

4 Was it -- did you and your husband design
5 it?

6 In other words, do you know any of
7 your -- whether any of your neighbors have a
8 pellet stove?

9 A. I don't recall seeing a pellet stove, so I
10 don't know.

11 Q. Where do you purchase the pellets?

12 A. My husband orders them and they're delivered.
13 I don't know where he gets them.

14 Q. Do you know what they're made of?

15 A. Wood.

16 Q. Does every home on Asa's Way have a front
17 yard?

18 A. Yes.

19 Q. And does every home have the same sized front
20 yard?

21 A. I don't know what the square footage is.

22 Q. You don't have to be specific about it.

23 In general does every home have the same
24 sized front yard?

25 MS. JOELSON: Objection.

1 A. I don't know how to answer that if I don't
2 know the footage so --

3 BY MS. SCHWARZ:

4 Q. Okay. Have you seen any front yards that are
5 bigger than yours on your street?

6 A. The shape of mine is different because of the
7 way it slopes down. So again, I'd have to
8 compare square footage to square footage.

9 Q. I understand.

10 A. Sorry.

11 Q. Oh, no, that's -- don't apologize.

12 Can you describe the shape of -- of
13 yours, your front yard?

14 A. So like I said before that -- and
15 respectfully -- I'm not referring to it as a
16 front yard because of the way the design is.
17 So I'm kind of saying along the side of my
18 house and forward I'm considering front.

19 Q. I apologize.

20 A. So, you know, in front of my house itself,
21 there's a small area of grass, and then along
22 the sides of my property where it comes down
23 to the road, there's more grass that kind of
24 slopes down on a hill.

25 Q. And that's different from other front yards on

1 Asa's Way?

2 A. Different how?

3 Q. The shape is different than the other front
4 yards on Asa's Way?

5 A. The shape of the yard?

6 Q. Yes.

7 A. So one of my neighbor's yards has a slope in
8 the front.

9 Q. Is that neighbor --

10 A. So part of the shape is the same because it's
11 sloping.

12 Q. I'm just asking -- Miss Addison, I believe you
13 testified you couldn't compare them because
14 yours is different because of the slope.

15 MS. JOSELSON: There's no pending
16 question.

17 A. I believe what I said is that I couldn't
18 compare the size.

19 BY MS. SCHWARZ:

20 Q. Right.

21 A. Yeah. So now you're asking about the shape.
22 So the shape and the size, in my mind, are two
23 different things.

24 Q. Pardon me. I thought that your testimony was
25 that you couldn't compare the sizes because

1 the shapes were different.

2 Is that not accurate?

3 A. Because in my mind the -- so if the shape is
4 different, in my mind I'm trying to convert it
5 to square footage because you're asking about
6 size.

7 Q. Mm-hmm. I understand.

8 A. So I'm saying, you know, putting a slope and
9 I'm trying to figure out square footage and
10 I'm kind of comparing it against their front,
11 so I'm answering it as best as I'm able to.

12 Q. I appreciate that. Okay. So but are the --
13 is the shape of your yard the same as other
14 front yards on Asa's Way?

15 MS. JOELSON: Asked and answered.

16 You can answer it again.

17 A. I believe I answered it. I'm sorry.

18 BY MS. SCHWARZ:

19 Q. Could you --

20 A. I don't think I can change the wording again.

21 Q. And I may have missed it, but can you
22 repeat --

23 A. Okay.

24 Q. Is the shape of your front yard the same as
25 the other front yards on Asa's Way?

1 MS. JOSELSON: Asked and answered.

2 You can answer it again.

3 A. So I have slopes.

4 BY MS. SCHWARZ:

5 Q. Yes.

6 A. Some of my neighbors have slopes. I have a
7 flat, and some of my neighbors have flats.

8 Q. Okay. And I believe you testified your home
9 is built -- built into a hill; is that
10 accurate?

11 A. It's built into the slope.

12 Q. Okay. And is that true for your neighbors, as
13 well, that they're built in the hill?

14 A. No.

15 Q. If you know, can you tell me how many other
16 properties on Asa's Way have a well?

17 A. Some of the lots are empty, so they don't have
18 well. And I believe all the other houses on
19 Asa's Way have a well, and they're not
20 connected to municipal water.

21 Q. Happen to know how deep each of those wells
22 is?

23 A. I do not know that.

24 Q. And how deep is the well on your property, if
25 you know?

1 A. I would have to refer to specs to look that
2 up.

3 Q. Do any of your neighbors have sheds, if you
4 know?

5 A. Are -- my neighbors on Asa's Way?

6 Q. Yes.

7 A. Not that I can think of -- not that I can
8 think of.

9 Q. Do you know whether all of the properties on
10 Asa's Way are impacted by PFOA?

11 MS. JOSELSON: Objection.

12 A. Do I know why they are impacted? I'm sorry?

13 BY MS. SCHWARZ:

14 Q. No, whether, whether. If they are.

15 A. Whether the houses on Asa's Way are impacted
16 by PFOA?

17 Q. Yeah.

18 A. Yes, I believe they are impacted by PFOA.

19 Q. Do you know whether they have -- PFOA was
20 detected in the homes with wells?

21 A. I can answer that by saying that there was
22 dots on all of my neighbors' houses on the
23 maps, with the exception of one on Susan
24 Taylor Lane.

25 Q. You consented to a -- being connected to

1 municipal water, correct?

2 A. Yes.

3 Q. And would a connection to public water impact
4 your damage estimation?

5 MS. JOSELSON: Objection.

6 A. Would the connection of water impact my damage
7 estimation?

8 BY MS. SCHWARZ:

9 Q. Yeah. I can ask it a different --

10 A. Yes.

11 Q. Once connected to municipal water, do you
12 think that that would increase the value of
13 your property?

14 A. I think it would improve the value of my
15 property.

16 MS. SCHWARZ: Take a five-minute break.

17 MR. SILVER: Okay.

18 THE VIDEOGRAPHER: Is that -- that it?
19 The time is now approximately 1:51 p.m. This
20 completes today's testimony of Leslie
21 Addison --

22 MS. JOSELSON: We're just taking a break.

23 THE VIDEOGRAPHER: Oh, a break. I'm
24 sorry.

25 The time is 1:51 p.m. Going off the

1 record.

2 (Brief recess taken.)

3 THE VIDEOGRAPHER: The time is now
4 approximately 2:06 p.m. Going back on the
5 record.

6 BY MS. SCHWARZ:

7 Q. Miss Addison, you're ready to proceed?

8 A. Yes.

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	Sub-category 1.6	25
	Sub-category 1.7	30
	Sub-category 1.8	100
	Sub-category 1.9	22
	Sub-category 1.10	45
Category 2	Sub-category 2.1	40
	Sub-category 2.2	85
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Category 3	Sub-category 3.1	55
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	Sub-category 3.5	110
	Sub-category 3.6	20
	Sub-category 3.7	58
	Sub-category 3.8	38
	Sub-category 3.9	105
	Sub-category 3.10	70
Category 4	Sub-category 4.1	25
	Sub-category 4.2	45
	Sub-category 4.3	100
	Sub-category 4.4	80
	Sub-category 4.5	30
	Sub-category 4.6	50
	Sub-category 4.7	120
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1 BY MS. SCHWARZ:

2 Q. -- after the detection of PFOA?

3 A. Do I believe that we've discussed all the
4 ways?

5 Q. Yes.

6 A. I think we touched on many of the ways.
7 There's probably ones I'm not remembering or
8 thinking of right off the top of my head.

9 Q. And do you believe that you currently suffer
10 from any health condition that you believe to
11 be caused by PFOA?

12 A. I don't believe I have a medical condition
13 that I know of now as a result of PFOA.

14 MS. SCHWARZ: Can we go off the record?

15 THE VIDEOGRAPHER: Sure. The time is now
16 approximately 2:42 p.m. Going off the record.

17 (Brief recess taken.)

18 THE VIDEOGRAPHER: The time is now
19 approximately 2:56 p.m. Going back on the
20 record.

21 BY MS. SCHWARZ:

22 Q. Miss Addison, thank you for your time today.
23 I just have one last question on Exhibit 5,
24 which is in front of you. They're Plaintiffs'
25 Response to Saint-Gobain First Set of

1 Interrogatories.

2 Do you see that?

3 A. Yes.

4 Q. If you could turn to page 5, No. 6.

5 A. (Witness complying)

6 Q. And No. 6 is: Identify every medical or other
7 health condition that plaintiffs believe to
8 have sustained due to PFOA exposure.

9 A. Yes.

10 Q. And -- and the response the -- it's the last
11 sentence says: Subject to and without waiving
12 the objection, based on blood testing by the
13 Senate of Vermont, we believe that our
14 ingestion of PFOA for many years has already
15 caused deleterious and long-term physiologic
16 alterations and damage to our blood, liver,
17 kidneys, immune system and other organs.

18 Did I read that correctly?

19 A. Yes.

20 MR. SILVER: Well, you said Senate of
21 Vermont. I think you meant the state of
22 Vermont.

23 MS. SCHWARZ: Oh, I apologize. Yes, by
24 the state of Vermont.

25 BY MS. SCHWARZ:

1 Q. Could you elaborate, please, on the specific
2 long-term and deleterious alterations and
3 damage?

4 Let's start with to your blood.

5 A. So I'm going to defer to the specialists on
6 this who are knowledgeable about toxic
7 exposure, but I have PFOA in my body. It's
8 there. I can't remove it. It has some kind
9 of potential for havoc.

10 Q. So you believe, consistent with what this
11 says, that you've -- your ingestion of PFOA
12 has already caused these deleterious effects?

13 Do you --

14 A. The existence of PFOA in my body beyond
15 background level has already caused because it
16 is there now.

17 MS. SCHWARZ: Thank you so much for your
18 time today, Miss Addison.

19 MS. JOELSON: I just have one follow-up.

20 CROSS-EXAMINATION

21 BY MS. JOELSON:

22 Q. You were asked about why you were not
23 gardening as you used to on your property.

24 Can you explain -- you said bad
25 feelings --

1 (Off-the-record colloquy.)

2 BY MS. JOELSON:

3 Q. I just have one question.

4 You said you're not gardening as you used
5 to. Can you explain why since PFOA?

6 MS. SCHWARZ: Objection.

7 A. So you made reference to me saying -- I was
8 having trouble articulating the feeling that I
9 had and my lack of confidence in that I am not
10 confident PFOA is not getting into my food
11 that I grow in the yard by way of soil, by way
12 of being watered by our hose, by way of just
13 absorption through the soil, despite us using
14 raised beds, which provide some separation.
15 I'm not confident, and it causes me worry and
16 fear.

17 MS. JOELSON: That's all I have.

18 THE VIDEOGRAPHER: That's it?

19 MS. SCHWARZ: Mm-hmm.

20 THE VIDEOGRAPHER: The time is now
21 approximately 2:59 p.m. This completes
22 today's testimony of Leslie Addison.

23 Going off the record.

24 * * * * *

25

1 ACKNOWLEDGMENT OF DEPONENT

2

3 I have read the foregoing transcript of

4 my deposition and except for any corrections or

5 changes noted on the errata sheet, I hereby

6 subscribe to the transcript as an accurate record

7 of the statements made by me.

8

9 _____

10 LESLIE ADDISON

11

12 SUBSCRIBED AND SWORN before and to me

13 this ____ day of _____, 20__.

14

15

16 _____

17 NOTARY PUBLIC

18

19

20 My Commission expires:

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25

CERTIFICATE

I, Beth Gaige, a Registered Professional Reporter, hereby certify that the within-named deponent was sworn to testify the truth, the whole truth, and nothing but the truth in the aforementioned cause of action.

I further certify that this deposition was stenographically reported by me and later reduced to print through computer-aided transcription, and the foregoing is a full and true record of the testimony given by the deponent.

I further certify that I am a disinterested person in the event or outcome of the above-named cause of action.

IN WITNESS WHEREOF, I subscribe my hand and affix my seal this 17TH day of April 2018.



Beth Gaige, RPR
Notary Public

My commission expires:
August 22, 2019

1

E R R A T A S H E E T

2

IN RE: SULLIVAN, et al. vs. SAINT-GOBAIN

3

DATE: 4/13/2018

4

PAGE	LINE	CORRECTION AND REASON
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LESLIE ADDISON

[& - 6th]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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